

**IN THE UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

**IN RE: REALPAGE, INC., RENTAL  
SOFTWARE ANTITRUST LITIGATION  
(NO. II)**

**CASE NO. 3:23-md-3071  
MDL No. 3071**

**Chief Judge Waverly D. Crenshaw, Jr.**

**This Document Relates to:**

**3:22-cv-01082  
3:23-cv-00552  
3:23-cv-00742  
3:23-cv-00979**

**DEFENDANT CORTLAND MANAGEMENT, LLC'S ANSWER TO PLAINTIFFS'  
SECOND AMENDED CONSOLIDATED CLASS ACTION COMPLAINT**

Pursuant to Rule 7 and 8 of the Federal Rules of Civil Procedure, Defendant Cortland Management, LLC ("Cortland"), by and through its undersigned counsel hereby answers and asserts defenses to the claims and allegations made by Plaintiffs in their Second Amended Consolidated Class Action Complaint ("Complaint").

**CORTLAND'S RESPONSES TO INDIVIDUAL PARAGRAPHS**

Numbered paragraphs below correspond to the like-numbered paragraphs in the Complaint. Except as specifically admitted, Cortland denies the allegations in the Complaint, including without limitation the Table of Contents, headings, subheadings, and illustrations contained within the Complaint. Plaintiffs' Complaint contains 266 footnotes. Any allegations contained therein do not comply with Federal Rule of Civil Procedure 10(b), providing that the allegations be stated "in numbered paragraphs, each limited as far as practicable to a single set of circumstances." Fed. R. Civ. P. 10(b). No response is therefore required to the Complaint's

footnotes. In any event, except as expressly admitted, Cortland denies any and all allegations contained in footnotes 1 through 266.

## **I. INTRODUCTION**

1. To the extent the allegations in Paragraph 1 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 1 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 1 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1, and, on that basis, denies them. To the extent allegations contained in Paragraph 1 pertain to Cortland, they are denied.

2. To the extent the allegations in Paragraph 2 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 2 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2, and, on that basis, denies them. To the extent allegations contained in Paragraph 2 pertain to Cortland, they are denied.

3. To the extent the allegations in Paragraph 3 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 3 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 3, and, on that basis, denies them. To the extent allegations contained in Paragraph 3 pertain to Cortland, they are denied.

4. To the extent the allegations in Paragraph 4 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 4 purport to quote from or interpret portions of a document, that document speaks for itself. As to

allegations contained in Paragraph 4 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 4, and, on that basis, denies them. To the extent allegations contained in Paragraph 4 pertain to Cortland, they are denied.

5. To the extent the allegations in Paragraph 5 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 5 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 5 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 5, and, on that basis, denies them. To the extent allegations contained in Paragraph 5 pertain to Cortland, they are denied.

6. To the extent the allegations in Paragraph 6 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 6 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 6, and, on that basis, denies them. To the extent allegations contained in Paragraph 6 pertain to Cortland, they are denied.

7. To the extent the allegations in Paragraph 7 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 7 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 7 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 7, and, on that basis, denies them. To the extent allegations contained in Paragraph 7 pertain to Cortland, they are denied.

8. To the extent the allegations in Paragraph 8 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 8 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 8, and, on that basis, denies them. To the extent allegations contained in Paragraph 8 pertain to Cortland, they are denied.

## **II. BACKGROUND**

9. To the extent the allegations in Paragraph 9 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 9 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 9 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 9, and, on that basis, denies them. To the extent allegations contained in Paragraph 9 pertain to Cortland, they are denied.

10. To the extent the allegations in Paragraph 10 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 10 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 10 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 10, and, on that basis, denies them. To the extent allegations contained in Paragraph 10 pertain to Cortland, they are denied.

11. To the extent the allegations in Paragraph 11 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 11 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient

to form a belief as to the truth of the allegations in Paragraph 11, and, on that basis, denies them. As to allegations contained in Paragraph 11 that pertain to Cortland, Cortland acknowledges that Paragraph 11 appears to selectively quote from or interpret a webcast identified in Footnote 12 *supra*, the webcast speaks for itself. All other allegations in Paragraph 11 are denied.

12. To the extent the allegations in Paragraph 12 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 12 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 12, and, on that basis, denies them. To the extent allegations contained in Paragraph 12 pertain to Cortland, they are denied.

13. To the extent the allegations in Paragraph 13 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 13 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 13 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 13, and, on that basis, denies them. To the extent allegations contained in Paragraph 13 pertain to Cortland, they are denied.

14. Cortland admits that it paid certain fees to RealPage for the use of the YieldStar software. To the extent the allegations in Paragraph 14 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 14 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 14, and, on that basis, denies them. To the extent allegations contained in Paragraph 14 pertain to Cortland, they are denied.

15. To the extent the allegations in Paragraph 15 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 15 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 15 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 15, and, on that basis, denies them. To the extent allegations contained in Paragraph 15 pertain to Cortland, they are denied.

16. To the extent the allegations in Paragraph 16 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 16 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 16 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 16, and, on that basis, denies them. To the extent allegations contained in Paragraph 16 pertain to Cortland, they are denied.

17. To the extent the allegations in Paragraph 17 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 17 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 17 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 17, and, on that basis, denies them. To the extent allegations contained in Paragraph 17 pertain to Cortland, they are denied.

18. To the extent the allegations in Paragraph 18 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph

18 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 18 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 18, and, on that basis, denies them. To the extent allegations contained in Paragraph 18 pertain to Cortland, they are denied.

19. To the extent the allegations in Paragraph 19 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 19 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 19 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 19, and, on that basis, denies them. To the extent allegations contained in Paragraph 19 pertain to Cortland, they are denied.

20. To the extent the allegations in Paragraph 20 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 20 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 20 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 20, and, on that basis, denies them. To the extent allegations contained in Paragraph 20 pertain to Cortland, they are denied.

21. To the extent the allegations in Paragraph 21 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 21 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 21 that pertain to other Defendants or third parties, Cortland lacks

knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 21, and, on that basis, denies them. To the extent allegations contained in Paragraph 21 pertain to Cortland, they are denied.

22. To the extent the allegations in Paragraph 22 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 22 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 22 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 22, and, on that basis, denies them. To the extent allegations contained in Paragraph 22 pertain to Cortland, they are denied.

23. To the extent the allegations in Paragraph 23 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 23 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 23 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 23, and, on that basis, denies them. To the extent allegations contained in Paragraph 23 pertain to Cortland, they are denied.

24. To the extent the allegations in Paragraph 24 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 24 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 24 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph



24, and, on that basis, denies them. To the extent allegations contained in Paragraph 24 pertain to Cortland, they are denied.

25. To the extent the allegations in Paragraph 25 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 25 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 25 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 25, and, on that basis, denies them. To the extent allegations contained in Paragraph 25 pertain to Cortland, they are denied.

26. To the extent the allegations in Paragraph 26 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 26 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 26 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 26, and, on that basis, denies them. To the extent allegations contained in Paragraph 26 pertain to Cortland, they are denied.

27. To the extent the allegations in Paragraph 27 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 27 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 27 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 27, and, on that basis, denies them. To the extent allegations contained in Paragraph 27 pertain to Cortland, they are denied.

28. To the extent that the allegations in Paragraph 28 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 28 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 28, and, on that basis, denies them. To the extent allegations contained in Paragraph 28 pertain to Cortland, they are denied.

29. To the extent the allegations in Paragraph 29 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 29 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 29 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 29, and, on that basis, denies them. To the extent allegations contained in Paragraph 29 pertain to Cortland, they are denied.

30. To the extent the allegations in Paragraph 30 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 30 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 30, and, on that basis, denies them. To the extent allegations contained in Paragraph 30 pertain to Cortland, they are denied.

31. To the extent the allegations in Paragraph 31 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 31 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 31 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph

31, and, on that basis, denies them. To the extent allegations contained in Paragraph 31 pertain to Cortland, they are denied.

32. To the extent the allegations in Paragraph 32 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 32 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 32, and, on that basis, denies them. To the extent allegations contained in Paragraph 32 pertain to Cortland, they are denied.

33. To the extent the allegations in Paragraph 33 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 33 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 33 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 33, and, on that basis, denies them. To the extent allegations contained in Paragraph 33 pertain to Cortland, they are denied.

34. To the extent the allegations in Paragraph 34 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 34 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 34 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 34, and, on that basis, denies them. To the extent allegations contained in Paragraph 34 pertain to Cortland, they are denied.

35. To the extent the allegations in Paragraph 35 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph

35 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 35 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 35, and, on that basis, denies them. To the extent allegations contained in Paragraph 35 pertain to Cortland, they are denied.

36. To the extent the allegations in Paragraph 36 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 36 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 36 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 36, and, on that basis, denies them. To the extent allegations contained in Paragraph 36 pertain to Cortland, they are denied.

37. To the extent the allegations in Paragraph 37 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 37 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 37 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 37, and, on that basis, denies them. To the extent allegations contained in Paragraph 37 pertain to Cortland, they are denied.

38. To the extent the allegations in Paragraph 38 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 38 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 38 that pertain to other Defendants or third parties, Cortland lacks

knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 38, and, on that basis, denies them. To the extent allegations contained in Paragraph 38 pertain to Cortland, they are denied.

39. To the extent the allegations in Paragraph 39 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 39 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 39 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 39, and, on that basis, denies them. To the extent allegations contained in Paragraph 39 pertain to Cortland, they are denied.

40. To the extent the allegations in Paragraph 40 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 40 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 40 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 40, and, on that basis, denies them. To the extent allegations contained in Paragraph 40 pertain to Cortland, they are denied.

41. To the extent the allegations in Paragraph 41 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 41 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 41 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph

41, and, on that basis, denies them. To the extent allegations contained in Paragraph 41 pertain to Cortland, they are denied.

42. To the extent the allegations in Paragraph 42 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 42 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 42 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 42, and, on that basis, denies them. To the extent allegations contained in Paragraph 42 pertain to Cortland, they are denied.

43. To the extent the allegations in Paragraph 43 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 43 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 43, and, on that basis, denies them. To the extent allegations contained in Paragraph 43 pertain to Cortland, they are denied.

### **III. JURISDICTION AND VENUE**

44. To the extent the allegations in Paragraph 44 are legal conclusions and characterizations, no responsive pleading is required. Insofar as any response is required, Cortland admits that the Plaintiffs purport to bring this antitrust class action lawsuit pursuant to Sections 4 and 16 of the Clayton Act (15 U.S.C. §§ 15 and 26) for violations of Section 1 of the Sherman Act (15 U.S.C. § 1). Except to the extent expressly admitted, Cortland denies the allegations in Paragraph 44.

45. To the extent the allegations in Paragraph 45 are legal conclusions and characterizations, no responsive pleading is required. Insofar as any response is required, Cortland

admits that the Plaintiffs purport to plead subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331, 1337, and Sections 4 and 16 of the Clayton Act (15 U.S.C. §§ 15(a), 26). Except to the extent expressly admitted, Cortland denies the allegations in Paragraph 45.

46. To the extent the allegations in Paragraph 46 are legal conclusions and characterizations, no responsive pleading is required. Insofar as any response is required, Cortland admits that the Plaintiffs purport to plead venue pursuant to Order of the Judicial Panel on Multidistrict Litigation transferring related actions to this District (“Related Actions”). *See, In re: RealPage, Inc., Rental Software Antitrust Litigation (No. II)*, No. MDL 3071, Dkt. 205 (U.S. Jud. Pan. Mult. Lit. Apr. 10, 2023).

47. To the extent the allegations in Paragraph 47 are legal conclusions and characterizations, no responsive pleading is required. Insofar as any response is required, Cortland admits that the Plaintiffs purport to plead personal jurisdiction over Cortland pursuant to the Clayton Act, 15 U.S.C. § 22. Cortland admits that, during some portion of the relevant time period, it was a manager of multifamily housing properties in the states of Alabama, Arizona, Colorado, Florida, Georgia, Idaho, Illinois, Minnesota, North Carolina, Ohio, Tennessee, Texas, and Virginia. Cortland denies that it was a manager of multifamily housing properties located in any other state. Except to the extent expressly admitted, Cortland denies the allegations in Paragraph 47.

48. As to allegations contained in Paragraph 48 that pertain to other Defendants, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 48, and, on that basis, denies them. To the extent allegations contained in Paragraph 48 pertain to Cortland, they are denied.

49. To the extent the allegations in Paragraph 49 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 49

that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 49, and, on that basis, denies them. To the extent allegations contained in Paragraph 49 pertain to Cortland, they are denied.

#### **IV. THE PARTIES**

50. To the extent the allegations in Paragraph 50 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 50 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 50, and, on that basis, denies them. To the extent allegations contained in Paragraph 50 pertain to Cortland, they are denied.

51. To the extent the allegations in Paragraph 51 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 51 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 51, and, on that basis, denies them. To the extent allegations contained in Paragraph 51 pertain to Cortland, they are denied.

52. To the extent the allegations in Paragraph 52 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 52 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 52, and, on that basis, denies them. To the extent allegations contained in Paragraph 52 pertain to Cortland, they are denied. , denies them.

53. To the extent the allegations in Paragraph 53 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 53 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient



to form a belief as to the truth of the allegations in Paragraph 53, and, on that basis, denies them. To the extent allegations contained in Paragraph 53 pertain to Cortland, they are denied.

54. To the extent the allegations in Paragraph 54 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 54 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 54, and, on that basis, denies them. To the extent allegations contained in Paragraph 54 pertain to Cortland, they are denied.

55. To the extent the allegations in Paragraph 55 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 55 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 55, and, on that basis, denies them. To the extent allegations contained in Paragraph 55 pertain to Cortland, they are denied.

56. To the extent the allegations in Paragraph 56 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 56 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 56, and, on that basis, denies them. To the extent allegations contained in Paragraph 56 pertain to Cortland, they are denied.

57. To the extent the allegations in Paragraph 57 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 57 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 57, and, on that basis, denies them. To the extent allegations contained in Paragraph 57 pertain to Cortland, they are denied.

58. To the extent the allegations in Paragraph 58 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 58 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 58, and, on that basis, denies them. To the extent allegations contained in Paragraph 58 pertain to Cortland, they are denied.

59. To the extent the allegations in Paragraph 59 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 59 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 59, and, on that basis, denies them. To the extent allegations contained in Paragraph 59 pertain to Cortland, they are denied.

60. To the extent the allegations in Paragraph 60 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 60 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 60, and, on that basis, denies them. To the extent allegations contained in Paragraph 60 pertain to Cortland, they are denied.

61. To the extent that the allegations in Paragraph 61 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 61 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 61, and, on that basis, denies them. To the extent allegations contained in Paragraph 61 pertain to Cortland, they are denied.

62. To the extent the allegations in Paragraph 62 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 62 purport to quote from or interpret portions of a document, that document speaks for itself. As to

allegations contained in Paragraph 62 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 62, and, on that basis, denies them. To the extent allegations contained in Paragraph 62 pertain to Cortland, they are denied.

63. To the extent the allegations in Paragraph 63 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 63 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 63 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 63, and, on that basis, denies them. To the extent allegations contained in Paragraph 63 pertain to Cortland, they are denied.

64. To the extent that the allegations in Paragraph 64 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 64 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 64, and, on that basis, denies them. To the extent allegations contained in Paragraph 64 pertain to Cortland, they are denied.

65. To the extent the allegations in Paragraph 65 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 65 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 65 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 65, and, on that basis, denies them. To the extent allegations contained in Paragraph 65 pertain to Cortland, they are denied.

66. To the extent the allegations in Paragraph 66 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 66 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 66 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 66, and, on that basis, denies them. To the extent allegations contained in Paragraph 66 pertain to Cortland, they are denied.

67. To the extent the allegations in Paragraph 67 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 67 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 67, and, on that basis, denies them. To the extent allegations contained in Paragraph 67 pertain to Cortland, they are denied.

68. To the extent the allegations in Paragraph 68 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 68 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 68 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 68, and, on that basis, denies them. To the extent allegations contained in Paragraph 68 pertain to Cortland, they are denied.

69. To the extent the allegations in Paragraph 69 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 69 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient

to form a belief as to the truth of the allegations in Paragraph 69, and, on that basis, denies them. To the extent allegations contained in Paragraph 69 pertain to Cortland, they are denied.

70. To the extent the allegations in Paragraph 70 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 70 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 70 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 70, and, on that basis, denies them. To the extent allegations contained in Paragraph 70 pertain to Cortland, they are denied.

71. To the extent the allegations in Paragraph 71 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 71 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 71, and, on that basis, denies them. To the extent allegations contained in Paragraph 71 pertain to Cortland, they are denied.

72. To the extent the allegations in Paragraph 72 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 72 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 72 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 72, and, on that basis, denies them. To the extent allegations contained in Paragraph 72 pertain to Cortland, they are denied.

73. To the extent the allegations in Paragraph 73 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 73

that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 73, and, on that basis, denies them. To the extent allegations contained in Paragraph 73 pertain to Cortland, they are denied.

74. To the extent the allegations in Paragraph 74 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 74 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 74 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 74, and, on that basis, denies them. To the extent allegations contained in Paragraph 74 pertain to Cortland, they are denied.

75. To the extent the allegations in Paragraph 75 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 75 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 75 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 75, and, on that basis, denies them. To the extent allegations contained in Paragraph 75 pertain to Cortland, they are denied.

76. To the extent the allegations in Paragraph 76 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 76 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 76, and, on that basis, denies them. To the extent allegations contained in Paragraph 76 pertain to Cortland, they are denied.

77. To the extent the allegations in Paragraph 77 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 77 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 77 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 77, and, on that basis, denies them. To the extent allegations contained in Paragraph 77 pertain to Cortland, they are denied.

78. To the extent the allegations in Paragraph 78 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 78 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 78 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 78, and, on that basis, denies them. To the extent allegations contained in Paragraph 78 pertain to Cortland, they are denied.

79. To the extent the allegations in Paragraph 79 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 79 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 79, and, on that basis, denies them. To the extent allegations contained in Paragraph 79 pertain to Cortland, they are denied.

80. To the extent the allegations in Paragraph 80 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 80 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 80 that pertain to other Defendants or third parties, Cortland lacks

knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 80, and, on that basis, denies them. To the extent allegations contained in Paragraph 80 pertain to Cortland, they are denied.

81. To the extent the allegations in Paragraph 81 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 81 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 81 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 81, and, on that basis, denies them. To the extent allegations contained in Paragraph 81 pertain to Cortland, they are denied.

82. To the extent the allegations in Paragraph 82 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 82 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 82, and, on that basis, denies them. To the extent allegations contained in Paragraph 82 pertain to Cortland, they are denied.

83. To the extent the allegations in Paragraph 83 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 83 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 83 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 83, and, on that basis, denies them. To the extent allegations contained in Paragraph 83 pertain to Cortland, they are denied.



84. To the extent the allegations in Paragraph 84 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 84 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 84, and, on that basis, denies them. To the extent allegations contained in Paragraph 84 pertain to Cortland, they are denied.

85. To the extent the allegations in Paragraph 85 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 85 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 85 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 85, and, on that basis, denies them. To the extent allegations contained in Paragraph 85 pertain to Cortland, they are denied.

86. To the extent the allegations in Paragraph 86 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 86 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 86 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 86, and, on that basis, denies them. To the extent allegations contained in Paragraph 86 pertain to Cortland, they are denied.

87. To the extent the allegations in Paragraph 87 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 87 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient

to form a belief as to the truth of the allegations in Paragraph 87, and, on that basis, denies them. To the extent allegations contained in Paragraph 87 pertain to Cortland, they are denied.

88. To the extent the allegations in Paragraph 88 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 88 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 88 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 88, and, on that basis, denies them. To the extent allegations contained in Paragraph 88 pertain to Cortland, they are denied.

89. To the extent the allegations in Paragraph 89 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 89 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 89 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 89, and, on that basis, denies them. To the extent allegations contained in Paragraph 89 pertain to Cortland, they are denied.

90. To the extent the allegations in Paragraph 90 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 90 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 90, and, on that basis, denies them. To the extent allegations contained in Paragraph 90 pertain to Cortland, they are denied.

91. To the extent the allegations in Paragraph 91 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph

91 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 91 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 91, and, on that basis, denies them. To the extent allegations contained in Paragraph 91 pertain to Cortland, they are denied.

92. To the extent the allegations in Paragraph 92 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 92 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 92 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 92, and, on that basis, denies them. To the extent allegations contained in Paragraph 92 pertain to Cortland, they are denied.

93. To the extent the allegations in Paragraph 93 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 93 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 93, and, on that basis, denies them. To the extent allegations contained in Paragraph 93 pertain to Cortland, they are denied.

94. To the extent the allegations in Paragraph 94 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 94 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 94 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph

94, and, on that basis, denies them. To the extent allegations contained in Paragraph 94 pertain to Cortland, they are denied.

95. To the extent the allegations in Paragraph 95 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 95 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 95 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 95, and, on that basis, denies them. To the extent allegations contained in Paragraph 95 pertain to Cortland, they are denied.

96. To the extent the allegations in Paragraph 96 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 96 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 96, and, on that basis, denies them. To the extent allegations contained in Paragraph 96 pertain to Cortland, they are denied.

97. To the extent the allegations in Paragraph 97 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 97 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 97 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 97, and, on that basis, denies them. To the extent allegations contained in Paragraph 97 pertain to Cortland, they are denied.

98. To the extent the allegations in Paragraph 98 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph

98 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 98 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 98, and, on that basis, denies them. To the extent allegations contained in Paragraph 98 pertain to Cortland, they are denied.

99. Cortland admits that it is a limited liability company headquartered in Atlanta, Georgia, organized and existing under the laws of Georgia. Cortland admits, during some portion of the relevant time period, that it was a manager of multifamily housing properties in the cities of Atlanta, GA; Austin, TX; Birmingham, AL; Charlotte, NC; Chicago, IL; Columbus, OH; Dallas-Fort Worth, TX; Denver, CO; Houston, TX; Miami, FL; Minneapolis, MN; Nashville, TN; Orlando, FL; Phoenix, AZ; Raleigh, NC; San Antonio, TX; Tampa, FL; and Tucson, AZ. Cortland denies the existence of a “regional submarket.” Cortland denies that it did business in any other state other than what is admitted to here. To the extent the allegations in Paragraph 99 are legal conclusions and characterizations, no responsive pleading is required. Except to the extent expressly admitted, Cortland denies the allegations in Paragraph 99.

100. To the extent the allegations in Paragraph 100 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 100 purport to quote from or interpret portions of a document, that document speaks for itself. Cortland admits, during the relevant time period, that Cortland entered into a written contract with RealPage pertaining to the use of RealPage’s software product, YieldStar. Cortland admits that, during a portion of the relevant time period, Kelly Nicholls was involved in the use of YieldStar at Cortland. Further, during a portion of the relevant time period, Cortland admits that Scott Moore

and Jessica Sanders had access to YieldStar at Cortland. Except to the extent expressly admitted, Cortland denies the allegations in Paragraph 100.

101. To the extent the allegations in Paragraph 101 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 101 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 101 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 101, and, on that basis, denies them. To the extent allegations contained in Paragraph 101 pertain to Cortland, they are denied.

102. To the extent the allegations in Paragraph 102 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 102 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 102, and, on that basis, denies them. To the extent allegations contained in Paragraph 102 pertain to Cortland, they are denied.

103. To the extent the allegations in Paragraph 103 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 103 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 103 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 103, and, on that basis, denies them. To the extent allegations contained in Paragraph 103 pertain to Cortland, they are denied.

104. To the extent the allegations in Paragraph 104 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph

104 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 104 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 104, and, on that basis, denies them. To the extent allegations contained in Paragraph 104 pertain to Cortland, they are denied.

105. To the extent the allegations in Paragraph 105 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 105 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 105, and, on that basis, denies them. To the extent allegations contained in Paragraph 105 pertain to Cortland, they are denied.

106. To the extent the allegations in Paragraph 106 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 106 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 106 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 106, and, on that basis, denies them. To the extent allegations contained in Paragraph 106 pertain to Cortland, they are denied.

107. To the extent the allegations in Paragraph 107 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 107 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 107 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in

Paragraph 107, and, on that basis, denies them. To the extent allegations contained in Paragraph 107 pertain to Cortland, they are denied.

108. To the extent the allegations in Paragraph 108 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 108 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 108, and, on that basis, denies them. To the extent allegations contained in Paragraph 108 pertain to Cortland, they are denied.

109. To the extent the allegations in Paragraph 109 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 109 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 109 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 109, and, on that basis, denies them. To the extent allegations contained in Paragraph 109 pertain to Cortland, they are denied.

110. To the extent the allegations in Paragraph 110 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 110 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 110 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 110, and, on that basis, denies them. To the extent allegations contained in Paragraph 110 pertain to Cortland, they are denied.

111. To the extent the allegations in Paragraph 111 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 111



that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 111, and, on that basis, denies them. To the extent allegations contained in Paragraph 111 pertain to Cortland, they are denied.

112. To the extent the allegations in Paragraph 112 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 112 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 112 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 112, and, on that basis, denies them. To the extent allegations contained in Paragraph 112 pertain to Cortland, they are denied.

113. To the extent the allegations in Paragraph 113 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 113 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 113 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 113, and, on that basis, denies them. To the extent allegations contained in Paragraph 113 pertain to Cortland, they are denied.

114. To the extent the allegations in Paragraph 114 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 114 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 114, and, on that basis, denies them. To the extent allegations contained in Paragraph 114 pertain to Cortland, they are denied.

115. To the extent the allegations in Paragraph 115 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 115 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 115 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 115, and, on that basis, denies them. To the extent allegations contained in Paragraph 115 pertain to Cortland, they are denied.

116. To the extent the allegations in Paragraph 116 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 116 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 116 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 116, and, on that basis, denies them. To the extent allegations contained in Paragraph 116 pertain to Cortland, they are denied.

117. To the extent the allegations in Paragraph 117 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 117 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 117, and, on that basis, denies them. To the extent allegations contained in Paragraph 117 pertain to Cortland, they are denied.

118. To the extent the allegations in Paragraph 118 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 118 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 118 that pertain to other Defendants or third parties, Cortland

lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 118, and, on that basis, denies them. To the extent allegations contained in Paragraph 118 pertain to Cortland, they are denied.

119. To the extent the allegations in Paragraph 119 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 119 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 119 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 119, and, on that basis, denies them. To the extent allegations contained in Paragraph 119 pertain to Cortland, they are denied.

120. To the extent the allegations in Paragraph 120 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 120 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 120, and, on that basis, denies them. To the extent allegations contained in Paragraph 120 pertain to Cortland, they are denied.

121. To the extent the allegations in Paragraph 121 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 121 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 121 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 121, and, on that basis, denies them. To the extent allegations contained in Paragraph 121 pertain to Cortland, they are denied.

122. To the extent the allegations in Paragraph 122 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 122 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 122 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 122, and, on that basis, denies them. To the extent allegations contained in Paragraph 122 pertain to Cortland, they are denied.

123. To the extent the allegations in Paragraph 123 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 123 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 123, and, on that basis, denies them. To the extent allegations contained in Paragraph 123 pertain to Cortland, they are denied.

124. To the extent the allegations in Paragraph 124 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 124 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 124 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 124, and, on that basis, denies them. To the extent allegations contained in Paragraph 124 pertain to Cortland, they are denied.

125. To the extent the allegations in Paragraph 125 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 125 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 125 that pertain to other Defendants or third parties, Cortland

lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 125, and, on that basis, denies them. To the extent allegations contained in Paragraph 125 pertain to Cortland, they are denied.

126. To the extent the allegations in Paragraph 126 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 126 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 126, and, on that basis, denies them. To the extent allegations contained in Paragraph 126 pertain to Cortland, they are denied.

127. To the extent the allegations in Paragraph 127 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 127 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 127 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 127, and, on that basis, denies them. To the extent allegations contained in Paragraph 127 pertain to Cortland, they are denied.

128. To the extent the allegations in Paragraph 128 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 128 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 128 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 128, and, on that basis, denies them. To the extent allegations contained in Paragraph 128 pertain to Cortland, they are denied.

129. To the extent the allegations in Paragraph 129 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 129 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 129, and, on that basis, denies them. To the extent allegations contained in Paragraph 129 pertain to Cortland, they are denied.

130. To the extent the allegations in Paragraph 130 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 130 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 130 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 130, and, on that basis, denies them. To the extent allegations contained in Paragraph 130 pertain to Cortland, they are denied.

131. To the extent the allegations in Paragraph 131 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 131 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 131 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 131, and, on that basis, denies them. To the extent allegations contained in Paragraph 131 pertain to Cortland, they are denied.

132. To the extent the allegations in Paragraph 132 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 132 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient

to form a belief as to the truth of the allegations in Paragraph 132, and, on that basis, denies them. To the extent allegations contained in Paragraph 132 pertain to Cortland, they are denied.

133. To the extent the allegations in Paragraph 133 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 133 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 133 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 133, and, on that basis, denies them. To the extent allegations contained in Paragraph 133 pertain to Cortland, they are denied.

134. To the extent the allegations in Paragraph 134 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 134 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 134 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 134, and, on that basis, denies them. To the extent allegations contained in Paragraph 134 pertain to Cortland, they are denied.

135. To the extent the allegations in Paragraph 135 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 135 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 135, and, on that basis, denies them. To the extent allegations contained in Paragraph 135 pertain to Cortland, they are denied.

136. To the extent the allegations in Paragraph 136 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph

136 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 136 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 136, and, on that basis, denies them. To the extent allegations contained in Paragraph 136 pertain to Cortland, they are denied.

137. To the extent the allegations in Paragraph 137 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 137 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 137 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 137, and, on that basis, denies them. To the extent allegations contained in Paragraph 137 pertain to Cortland, they are denied.

138. To the extent the allegations in Paragraph 138 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 138 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 138, and, on that basis, denies them. To the extent allegations contained in Paragraph 138 pertain to Cortland, they are denied.

139. To the extent the allegations in Paragraph 139 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 139 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 139 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in



Paragraph 139, and, on that basis, denies them. To the extent allegations contained in Paragraph 139 pertain to Cortland, they are denied.

140. To the extent the allegations in Paragraph 140 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 140 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 140 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 140, and, on that basis, denies them. To the extent allegations contained in Paragraph 140 pertain to Cortland, they are denied.

141. To the extent the allegations in Paragraph 141 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 141 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 141, and, on that basis, denies them. To the extent allegations contained in Paragraph 141 pertain to Cortland, they are denied.

142. To the extent the allegations in Paragraph 142 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 142 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 142 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 142, and, on that basis, denies them. To the extent allegations contained in Paragraph 142 pertain to Cortland, they are denied.

143. To the extent the allegations in Paragraph 143 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph

143 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 143 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 143, and, on that basis, denies them. To the extent allegations contained in Paragraph 143 pertain to Cortland, they are denied.

144. To the extent the allegations in Paragraph 144 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 144 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 144, and, on that basis, denies them. To the extent allegations contained in Paragraph 144 pertain to Cortland, they are denied.

145. To the extent the allegations in Paragraph 145 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 145 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 145 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 145, and, on that basis, denies them. To the extent allegations contained in Paragraph 145 pertain to Cortland, they are denied.

146. To the extent the allegations in Paragraph 146 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 146 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 146 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in

Paragraph 146, and, on that basis, denies them. To the extent allegations contained in Paragraph 146 pertain to Cortland, they are denied.

147. To the extent the allegations in Paragraph 147 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 147 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 147, and, on that basis, denies them. To the extent allegations contained in Paragraph 147 pertain to Cortland, they are denied.

148. To the extent the allegations in Paragraph 148 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 148 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 148 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 148, and, on that basis, denies them. To the extent allegations contained in Paragraph 148 pertain to Cortland, they are denied.

149. To the extent the allegations in Paragraph 149 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 149 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 149 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 149, and, on that basis, denies them. To the extent allegations contained in Paragraph 149 pertain to Cortland, they are denied.

150. To the extent the allegations in Paragraph 150 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 150

that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 150, and, on that basis, denies them. To the extent allegations contained in Paragraph 150 pertain to Cortland, they are denied.

151. To the extent the allegations in Paragraph 151 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 151 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 151 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 151, and, on that basis, denies them. To the extent allegations contained in Paragraph 151 pertain to Cortland, they are denied.

152. To the extent the allegations in Paragraph 152 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 152 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 152 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 152, and, on that basis, denies them. To the extent allegations contained in Paragraph 152 pertain to Cortland, they are denied.

153. To the extent the allegations in Paragraph 153 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 153 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 153, and, on that basis, denies them. To the extent allegations contained in Paragraph 153 pertain to Cortland, they are denied.

154. To the extent the allegations in Paragraph 154 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 154 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 154 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 154, and, on that basis, denies them. To the extent allegations contained in Paragraph 154 pertain to Cortland, they are denied.

155. To the extent the allegations in Paragraph 155 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 155 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 155 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 155, and, on that basis, denies them. To the extent allegations contained in Paragraph 155 pertain to Cortland, they are denied.

156. To the extent the allegations in Paragraph 156 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 156 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 156, and, on that basis, denies them. To the extent allegations contained in Paragraph 156 pertain to Cortland, they are denied.

157. To the extent the allegations in Paragraph 157 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 157 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 157 that pertain to other Defendants or third parties, Cortland

lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 157, and, on that basis, denies them. To the extent allegations contained in Paragraph 157 pertain to Cortland, they are denied.

158. To the extent the allegations in Paragraph 158 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 158 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 158 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 158, and, on that basis, denies them. To the extent allegations contained in Paragraph 158 pertain to Cortland, they are denied.

159. To the extent the allegations in Paragraph 159 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 159 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 159, and, on that basis, denies them. To the extent allegations contained in Paragraph 159 pertain to Cortland, they are denied.

160. To the extent the allegations in Paragraph 160 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 160 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 160 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 160, and, on that basis, denies them. To the extent allegations contained in Paragraph 160 pertain to Cortland, they are denied.

161. To the extent the allegations in Paragraph 161 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 161 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 161 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 161, and, on that basis, denies them. To the extent allegations contained in Paragraph 161 pertain to Cortland, they are denied.

162. To the extent the allegations in Paragraph 162 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 162 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 162, and, on that basis, denies them. To the extent allegations contained in Paragraph 162 pertain to Cortland, they are denied.

163. To the extent the allegations in Paragraph 163 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 163 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 163 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 163, and, on that basis, denies them. To the extent allegations contained in Paragraph 163 pertain to Cortland, they are denied.

164. To the extent the allegations in Paragraph 164 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 164 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 164 that pertain to other Defendants or third parties, Cortland

lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 164, and, on that basis, denies them. To the extent allegations contained in Paragraph 164 pertain to Cortland, they are denied.

165. To the extent the allegations in Paragraph 165 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 165 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 165, and, on that basis, denies them. To the extent allegations contained in Paragraph 165 pertain to Cortland, they are denied.

166. To the extent the allegations in Paragraph 166 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 166 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 166 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 166, and, on that basis, denies them. To the extent allegations contained in Paragraph 166 pertain to Cortland, they are denied.

167. To the extent the allegations in Paragraph 167 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 167 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 167 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 167, and, on that basis, denies them. To the extent allegations contained in Paragraph 167 pertain to Cortland, they are denied.



168. To the extent the allegations in Paragraph 168 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 168 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 168, and, on that basis, denies them. To the extent allegations contained in Paragraph 168 pertain to Cortland, they are denied.

169. To the extent the allegations in Paragraph 169 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 169 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 169 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 169, and, on that basis, denies them. To the extent allegations contained in Paragraph 169 pertain to Cortland, they are denied.

170. To the extent the allegations in Paragraph 170 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 170 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 170 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 170, and, on that basis, denies them. To the extent allegations contained in Paragraph 170 pertain to Cortland, they are denied.

171. To the extent the allegations in Paragraph 171 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 171 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient

to form a belief as to the truth of the allegations in Paragraph 171, and, on that basis, denies them. To the extent allegations contained in Paragraph 171 pertain to Cortland, they are denied.

172. To the extent the allegations in Paragraph 172 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 172 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 172 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 172, and, on that basis, denies them. To the extent allegations contained in Paragraph 172 pertain to Cortland, they are denied.

173. To the extent the allegations in Paragraph 173 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 173 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 173 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 173, and, on that basis, denies them. To the extent allegations contained in Paragraph 173 pertain to Cortland, they are denied.

174. To the extent the allegations in Paragraph 174 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 174 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 174, and, on that basis, denies them. To the extent allegations contained in Paragraph 174 pertain to Cortland, they are denied.

175. To the extent the allegations in Paragraph 175 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph

175 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 175 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 175, and, on that basis, denies them. To the extent allegations contained in Paragraph 175 pertain to Cortland, they are denied.

176. To the extent the allegations in Paragraph 176 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 176 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 176 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 176, and, on that basis, denies them. To the extent allegations contained in Paragraph 176 pertain to Cortland, they are denied.

177. To the extent the allegations in Paragraph 177 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 177 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 177, and, on that basis, denies them. To the extent allegations contained in Paragraph 177 pertain to Cortland, they are denied.

178. To the extent the allegations in Paragraph 178 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 178 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 178 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in

Paragraph 178, and, on that basis, denies them. To the extent allegations contained in Paragraph 178 pertain to Cortland, they are denied.

179. To the extent the allegations in Paragraph 179 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 179 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 179 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 179, and, on that basis, denies them. To the extent allegations contained in Paragraph 179 pertain to Cortland, they are denied.

180. To the extent the allegations in Paragraph 180 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 180 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 180, and, on that basis, denies them. To the extent allegations contained in Paragraph 180 pertain to Cortland, they are denied.

181. To the extent the allegations in Paragraph 181 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 181 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 181 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 181, and, on that basis, denies them. To the extent allegations contained in Paragraph 181 pertain to Cortland, they are denied.

182. To the extent the allegations in Paragraph 182 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 182

that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 182, and, on that basis, denies them. To the extent allegations contained in Paragraph 182 pertain to Cortland, they are denied.

183. To the extent the allegations in Paragraph 183 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 183 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 183 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 183, and, on that basis, denies them. To the extent allegations contained in Paragraph 183 pertain to Cortland, they are denied.

184. To the extent the allegations in Paragraph 184 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 184 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 184 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 184, and, on that basis, denies them. To the extent allegations contained in Paragraph 184 pertain to Cortland, they are denied.

185. To the extent the allegations in Paragraph 185 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 185 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 185, and, on that basis, denies them. To the extent allegations contained in Paragraph 185 pertain to Cortland, they are denied.

186. To the extent the allegations in Paragraph 186 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 186 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 186 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 186, and, on that basis, denies them. To the extent allegations contained in Paragraph 186 pertain to Cortland, they are denied.

187. To the extent the allegations in Paragraph 187 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 187 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 187, and, on that basis, denies them. To the extent allegations contained in Paragraph 187 pertain to Cortland, they are denied.

188. To the extent the allegations in Paragraph 188 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 188 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 188 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 188, and, on that basis, denies them. To the extent allegations contained in Paragraph 188 pertain to Cortland, they are denied.

189. To the extent the allegations in Paragraph 189 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 189 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient

to form a belief as to the truth of the allegations in Paragraph 189, and, on that basis, denies them. To the extent allegations contained in Paragraph 189 pertain to Cortland, they are denied.

190. To the extent the allegations in Paragraph 190 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 190 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 190 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 190, and, on that basis, denies them. To the extent allegations contained in Paragraph 190 pertain to Cortland, they are denied.

191. To the extent the allegations in Paragraph 191 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 191 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 191 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 191, and, on that basis, denies them. To the extent allegations contained in Paragraph 191 pertain to Cortland, they are denied.

192. To the extent the allegations in Paragraph 192 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 192 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 192, and, on that basis, denies them. To the extent allegations contained in Paragraph 192 pertain to Cortland, they are denied.

193. To the extent the allegations in Paragraph 193 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph

193 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 193 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 193, and, on that basis, denies them. To the extent allegations contained in Paragraph 193 pertain to Cortland, they are denied.

194. To the extent the allegations in Paragraph 194 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 194 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 194, and, on that basis, denies them. To the extent allegations contained in Paragraph 194 pertain to Cortland, they are denied.

195. To the extent the allegations in Paragraph 195 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 195 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 195 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 195, and, on that basis, denies them. To the extent allegations contained in Paragraph 195 pertain to Cortland, they are denied.

196. To the extent the allegations in Paragraph 196 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 196 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 196 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in



Paragraph 196, and, on that basis, denies them. To the extent allegations contained in Paragraph 196 pertain to Cortland, they are denied.

197. To the extent the allegations in Paragraph 197 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 197 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 197 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 197, and, on that basis, denies them. To the extent allegations contained in Paragraph 197 pertain to Cortland, they are denied.

198. To the extent the allegations in Paragraph 198 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 198 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 198 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 198, and, on that basis, denies them. To the extent allegations contained in Paragraph 198 pertain to Cortland, they are denied.

199. To the extent the allegations in Paragraph 199 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 199 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 199, and, on that basis, denies them. To the extent allegations contained in Paragraph 199 pertain to Cortland, they are denied.

200. To the extent the allegations in Paragraph 200 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 200

that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 200, and, on that basis, denies them. To the extent allegations contained in Paragraph 200 pertain to Cortland, they are denied.

201. To the extent the allegations in Paragraph 201 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 201 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 201 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 201, and, on that basis, denies them. To the extent allegations contained in Paragraph 201 pertain to Cortland, they are denied.

## **V. FACTUAL ALLEGATIONS**

### **A. Historical Competition Among Residential Property Managers.**

202. To the extent the allegations in Paragraph 202 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 202 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 202 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 202, and, on that basis, denies them. To the extent allegations contained in Paragraph 202 pertain to Cortland, they are denied.

203. To the extent the allegations in Paragraph 203 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 203 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 203 that pertain to other Defendants or third parties, Cortland

lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 203, and, on that basis, denies them. To the extent allegations contained in Paragraph 203 pertain to Cortland, they are denied.

204. To the extent the allegations in Paragraph 204 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 204 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 204 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 204, and, on that basis, denies them. To the extent allegations contained in Paragraph 204 pertain to Cortland, they are denied.

205. To the extent the allegations in Paragraph 205 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 205 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 205, and, on that basis, denies them. To the extent allegations contained in Paragraph 205 pertain to Cortland, they are denied.

206. To the extent the allegations in Paragraph 206 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 206 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 206 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 206, and, on that basis, denies them. To the extent allegations contained in Paragraph 206 pertain to Cortland, they are denied.

207. To the extent the allegations in Paragraph 207 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 207 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 207 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 207, and, on that basis, denies them. To the extent allegations contained in Paragraph 207 pertain to Cortland, they are denied.

#### **B. Evolution of RealPage's Revenue Management Solutions**

208. To the extent the allegations in Paragraph 208 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 208 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 208 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 208, and, on that basis, denies them. To the extent allegations contained in Paragraph 208 pertain to Cortland, they are denied.

209. To the extent the allegations in Paragraph 209 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 209 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 209 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 209, and, on that basis, denies them. To the extent allegations contained in Paragraph 209 pertain to Cortland, they are denied.

210. To the extent the allegations in Paragraph 210 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 210 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 210 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 210, and, on that basis, denies them. To the extent allegations contained in Paragraph 210 pertain to Cortland, they are denied.

211. To the extent the allegations in Paragraph 211 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 211 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 211 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 211, and, on that basis, denies them. To the extent allegations contained in Paragraph 211 pertain to Cortland, they are denied.

212. To the extent the allegations in Paragraph 212 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 212 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 212, and, on that basis, denies them. To the extent allegations contained in Paragraph 212 pertain to Cortland, they are denied.

213. To the extent the allegations in Paragraph 213 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 213 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 213 that pertain to other Defendants or third parties, Cortland

lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 213, and, on that basis, denies them. To the extent allegations contained in Paragraph 213 pertain to Cortland, they are denied.

214. To the extent that the allegations in Paragraph 214 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 214 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 214, and, on that basis, denies them. To the extent allegations contained in Paragraph 214 pertain to Cortland, they are denied.

215. To the extent the allegations in Paragraph 215 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 215 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 215 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 215, and, on that basis, denies them. To the extent allegations contained in Paragraph 215 pertain to Cortland, they are denied.

216. To the extent the allegations in Paragraph 216 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 216 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 216 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 216, and, on that basis, denies them. To the extent allegations contained in Paragraph 216 pertain to Cortland, they are denied.

217. To the extent the allegations in Paragraph 217 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 217 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 217 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 217, and, on that basis, denies them. To the extent allegations contained in Paragraph 217 pertain to Cortland, they are denied.

218. To the extent the allegations in Paragraph 218 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 218 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 218 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 218, and, on that basis, denies them. To the extent allegations contained in Paragraph 218 pertain to Cortland, they are denied.

219. To the extent the allegations in Paragraph 219 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 219 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 219 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 219, and, on that basis, denies them. To the extent allegations contained in Paragraph 219 pertain to Cortland, they are denied.

220. To the extent the allegations in Paragraph 220 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph

220 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 220 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 220, and, on that basis, denies them. To the extent allegations contained in Paragraph 220 pertain to Cortland, they are denied.

221. To the extent that the allegations in Paragraph 221 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 221 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 221, and, on that basis, denies them. To the extent allegations contained in Paragraph 221 pertain to Cortland, they are denied.

222. As to allegations contained in Paragraph 222 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 222, and, on that basis, denies them. To the extent allegations contained in Paragraph 222 pertain to Cortland, they are denied.

223. To the extent the allegations in Paragraph 223 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 223 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 223 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 223, and, on that basis, denies them. To the extent allegations contained in Paragraph 223 pertain to Cortland, they are denied.

224. To the extent the allegations in Paragraph 224 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph



224 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 224 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 224, and, on that basis, denies them. To the extent allegations contained in Paragraph 224 pertain to Cortland, they are denied.

225. To the extent the allegations in Paragraph 225 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 225 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 225 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 225, and, on that basis, denies them. To the extent allegations contained in Paragraph 225 pertain to Cortland, they are denied.

226. To the extent the allegations in Paragraph 226 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 226 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 226 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 226, and, on that basis, denies them. To the extent allegations contained in Paragraph 226 pertain to Cortland, they are denied.

**C. Property Management Companies Effectively Outsourced Pricing and Supply Decisions to RealPage, Eliminating Competition.**

227. To the extent the allegations in Paragraph 227 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 227 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient

to form a belief as to the truth of the allegations in Paragraph 227, and, on that basis, denies them. To the extent allegations contained in Paragraph 227 pertain to Cortland, they are denied.

228. To the extent the allegations in Paragraph 228 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 228 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 228 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 228, and, on that basis, denies them. To the extent allegations contained in Paragraph 228 pertain to Cortland, they are denied.

229. To the extent the allegations in Paragraph 229 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 229 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 229 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 229, and, on that basis, denies them. To the extent allegations contained in Paragraph 229 pertain to Cortland, they are denied.

230. To the extent the allegations in Paragraph 230 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 230 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 230 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 230, and, on that basis, denies them. To the extent allegations contained in Paragraph 230 pertain to Cortland, they are denied.

231. To the extent the allegations in Paragraph 231 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 231 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 231, and, on that basis, denies them. To the extent allegations contained in Paragraph 231 pertain to Cortland, they are denied.

232. To the extent the allegations in Paragraph 232 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 232 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 232 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 232, and, on that basis, denies them. To the extent allegations contained in Paragraph 232 pertain to Cortland, they are denied.

233. To the extent the allegations in Paragraph 233 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 233 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 233 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 233, and, on that basis, denies them. To the extent allegations contained in Paragraph 233 pertain to Cortland, they are denied.

234. To the extent the allegations in Paragraph 234 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 234 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 234 that pertain to other Defendants or third parties, Cortland

lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 234, and, on that basis, denies them. To the extent allegations contained in Paragraph 234 pertain to Cortland, they are denied.

235. To the extent the allegations in Paragraph 235 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 235 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 235 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 235, and, on that basis, denies them. To the extent allegations contained in Paragraph 235 pertain to Cortland, they are denied.

236. To the extent the allegations in Paragraph 236 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 236 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 236 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 236, and, on that basis, denies them. To the extent allegations contained in Paragraph 236 pertain to Cortland, they are denied.

237. To the extent that the allegations in Paragraph 237 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 237 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 237, and, on that basis, denies them. To the extent allegations contained in Paragraph 237 pertain to Cortland, they are denied.

238. To the extent that the allegations in Paragraph 238 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 238 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 238, and, on that basis, denies them. To the extent allegations contained in Paragraph 238 pertain to Cortland, they are denied.

239. To the extent the allegations in Paragraph 239 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 239 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 239 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 239, and, on that basis, denies them. To the extent allegations contained in Paragraph 239 pertain to Cortland, they are denied.

240. To the extent the allegations in Paragraph 240 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 240 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 240 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 240, and, on that basis, denies them. To the extent allegations contained in Paragraph 240 pertain to Cortland, they are denied.

241. To the extent that the allegations in Paragraph 241 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 241 that pertain to other Defendants or third parties, Cortland lacks knowledge or information

sufficient to form a belief as to the truth of the allegations in Paragraph 241, and, on that basis, denies them. To the extent allegations contained in Paragraph 241 pertain to Cortland, they are denied.

242. To the extent the allegations in Paragraph 242 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 242 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 242 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 242, and, on that basis, denies them. To the extent allegations contained in Paragraph 242 pertain to Cortland, they are denied.

243. To the extent that the allegations in Paragraph 243 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 243 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 243, and, on that basis, denies them. To the extent allegations contained in Paragraph 243 pertain to Cortland, they are denied.

244. To the extent the allegations in Paragraph 244 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 244 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 244 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 244, and, on that basis, denies them. To the extent allegations contained in Paragraph 244 pertain to Cortland, they are denied.

245. To the extent the allegations in Paragraph 245 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph

245 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 245 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 245, and, on that basis, denies them. To the extent allegations contained in Paragraph 245 pertain to Cortland, they are denied.

246. To the extent the allegations in Paragraph 246 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 246 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 246 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 246, and, on that basis, denies them. To the extent allegations contained in Paragraph 246 pertain to Cortland, they are denied.

247. To the extent the allegations in Paragraph 247 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 247 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 247 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 247, and, on that basis, denies them. To the extent allegations contained in Paragraph 247 pertain to Cortland, they are denied.

248. To the extent the allegations in Paragraph 248 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 248 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 248 that pertain to other Defendants or third parties, Cortland

lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 248, and, on that basis, denies them. To the extent allegations contained in Paragraph 248 pertain to Cortland, they are denied.

249. To the extent the allegations in Paragraph 249 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 249 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 249 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 249, and, on that basis, denies them. To the extent allegations contained in Paragraph 249 pertain to Cortland, they are denied.

250. To the extent the allegations in Paragraph 250 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 250 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 250 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 250, and, on that basis, denies them. To the extent allegations contained in Paragraph 250 pertain to Cortland, they are denied.

251. To the extent the allegations in Paragraph 251 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 251 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 251 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in



Paragraph 251, and, on that basis, denies them. To the extent allegations contained in Paragraph 251 pertain to Cortland, they are denied.

252. To the extent the allegations in Paragraph 252 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 252 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 252 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 252, and, on that basis, denies them. To the extent allegations contained in Paragraph 252 pertain to Cortland, they are denied.

253. To the extent the allegations in Paragraph 253 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 253 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 253 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 253, and, on that basis, denies them. To the extent allegations contained in Paragraph 253 pertain to Cortland, they are denied.

254. To the extent the allegations in Paragraph 254 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 254 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 254 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 254, and, on that basis, denies them. To the extent allegations contained in Paragraph 254 pertain to Cortland, they are denied.

**D. Defendants Collectively Monitor Compliance with the Scheme.**

255. To the extent the allegations in Paragraph 255 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 255 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 255 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 255, and, on that basis, denies them. To the extent allegations contained in Paragraph 255 pertain to Cortland, they are denied.

256. To the extent the allegations in Paragraph 256 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 256 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 256 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 256, and, on that basis, denies them. To the extent allegations contained in Paragraph 256 pertain to Cortland, they are denied.

257. To the extent that the allegations in Paragraph 257 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 257 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 257, and, on that basis, denies them. To the extent allegations contained in Paragraph 257 pertain to Cortland, they are denied.

258. To the extent that the allegations in Paragraph 258 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 258 that pertain to other Defendants or third parties, Cortland lacks knowledge or information

sufficient to form a belief as to the truth of the allegations in Paragraph 258, and, on that basis, denies them. To the extent allegations contained in Paragraph 258 pertain to Cortland, they are denied.

259. To the extent the allegations in Paragraph 259 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 259 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 259 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 259, and, on that basis, denies them. To the extent allegations contained in Paragraph 259 pertain to Cortland, they are denied.

260. To the extent the allegations in Paragraph 260 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 260 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 260 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 260, and, on that basis, denies them. To the extent allegations contained in Paragraph 260 pertain to Cortland, they are denied.

261. To the extent the allegations in Paragraph 261 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 261 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 261 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 261, and, on that basis, denies them. To the extent allegations contained in Paragraph 261 pertain to Cortland, they are denied.

262. To the extent the allegations in Paragraph 262 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 262 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 262 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 262, and, on that basis, denies them. To the extent allegations contained in Paragraph 262 pertain to Cortland, they are denied.

263. As to allegations contained in Paragraph 263 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 263, and, on that basis, denies them. To the extent allegations contained in Paragraph 263 pertain to Cortland, they are denied.

264. As to allegations contained in Paragraph 264 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 264, and, on that basis, denies them. To the extent allegations contained in Paragraph 264 pertain to Cortland, they are denied.

265. As to allegations contained in Paragraph 265 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 265, and, on that basis, denies them. To the extent allegations contained in Paragraph 265 pertain to Cortland, they are denied.

266. As to allegations contained in Paragraph 266 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 266, and, on that basis, denies them. To the extent allegations contained in Paragraph 266 pertain to Cortland, they are denied.

267. As to allegations contained in Paragraph 267 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 267, and, on that basis, denies them. To the extent allegations contained in Paragraph 267 pertain to Cortland, they are denied.

268. As to allegations contained in Paragraph 268 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 268, and, on that basis, denies them. To the extent allegations contained in Paragraph 268 pertain to Cortland, they are denied.

269. As to allegations contained in Paragraph 269 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 269, and, on that basis, denies them. To the extent allegations contained in Paragraph 269 pertain to Cortland, they are denied.

270. As to allegations contained in Paragraph 270 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 270, and, on that basis, denies them. To the extent allegations contained in Paragraph 270 pertain to Cortland, they are denied.

271. As to allegations contained in Paragraph 271 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 271, and, on that basis, denies them. To the extent allegations contained in Paragraph 271 pertain to Cortland, they are denied.

272. As to allegations contained in Paragraph 272 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the

allegations in Paragraph 272, and, on that basis, denies them. To the extent allegations contained in Paragraph 272 pertain to Cortland, they are denied.

273. To the extent the allegations in Paragraph 273 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 273 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 273 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 273, and, on that basis, denies them. To the extent allegations contained in Paragraph 273 pertain to Cortland, they are denied.

274. To the extent the allegations in Paragraph 274 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 274 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 274 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 274, and, on that basis, denies them. To the extent allegations contained in Paragraph 274 pertain to Cortland, they are denied.

275. To the extent that the allegations in Paragraph 275 purport to quote from or interpret or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 275 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 275, and, on that basis, denies them. To the extent allegations contained in Paragraph 275 pertain to Cortland, they are denied.

276. As to allegations contained in Paragraph 276 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 276, and, on that basis, denies them. To the extent allegations contained in Paragraph 276 pertain to Cortland, they are denied.

277. To the extent that the allegations in Paragraph 277 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 277 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 277, and, on that basis, denies them. To the extent allegations contained in Paragraph 277 pertain to Cortland, they are denied.

278. As to allegations contained in Paragraph 278 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 278, and, on that basis, denies them. To the extent allegations contained in Paragraph 278 pertain to Cortland, they are denied.

279. As to allegations contained in Paragraph 279 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 279, and, on that basis, denies them. To the extent allegations contained in Paragraph 279 pertain to Cortland, they are denied.

280. To the extent the allegations in Paragraph 280 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 280 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 280, and, on that basis, denies them. To the extent allegations contained in Paragraph 280 pertain to Cortland, they are denied.

281. To the extent the allegations in Paragraph 281 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 281 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 281, and, on that basis, denies them. To the extent allegations contained in Paragraph 281 pertain to Cortland, they are denied.

282. To the extent the allegations in Paragraph 282 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 282 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 282, and, on that basis, denies them. To the extent allegations contained in Paragraph 282 pertain to Cortland, they are denied.

283. As to allegations contained in Paragraph 283 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 283, and, on that basis, denies them. To the extent allegations contained in Paragraph 283 pertain to Cortland, they are denied.

284. As to allegations contained in Paragraph 284 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 284, and, on that basis, denies them. To the extent allegations contained in Paragraph 284 pertain to Cortland, they are denied.

285. As to allegations contained in Paragraph 285 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 285, and, on that basis, denies them. To the extent allegations contained in Paragraph 285 pertain to Cortland, they are denied.



286. As to allegations contained in Paragraph 286 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 286, and, on that basis, denies them. To the extent allegations contained in Paragraph 286 pertain to Cortland, they are denied.

**E. Property Owners and Managers Who Adopted RealPage's Pricing Recommendations Did So With the Common Goal of Raising Rent Prices Which Caused Inflated Rental Prices and Reduced Occupancy Levels in Their Respective Metro Areas.**

287. To the extent the allegations in Paragraph 287 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 287 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 287, and, on that basis, denies them. To the extent allegations contained in Paragraph 287 pertain to Cortland, they are denied.

288. To the extent the allegations in Paragraph 288 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 288 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 288, and, on that basis, denies them. To the extent allegations contained in Paragraph 288 pertain to Cortland, they are denied.

289. To the extent the allegations in Paragraph 289 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 289 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 289, and, on that basis, denies them. To the extent allegations contained in Paragraph 289 pertain to Cortland, they are denied.

290. To the extent that the allegations in Paragraph 290 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph

290 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 290, and, on that basis, denies them. To the extent allegations contained in Paragraph 290 pertain to Cortland, they are denied.

291. To the extent the allegations in Paragraph 291 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 291 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 291, and, on that basis, denies them. To the extent allegations contained in Paragraph 291 pertain to Cortland, they are denied.

292. To the extent the allegations in Paragraph 292 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 292 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 292, and, on that basis, denies them. To the extent allegations contained in Paragraph 292 pertain to Cortland, they are denied.

293. To the extent the allegations in Paragraph 293 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 293 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 293, and, on that basis, denies them. To the extent allegations contained in Paragraph 293 pertain to Cortland, they are denied.

294. As to allegations contained in Paragraph 294 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 294, and, on that basis, denies them. To the extent allegations contained in Paragraph 294 pertain to Cortland, they are denied.

295. As to allegations contained in Paragraph 295 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 295, and, on that basis, denies them. To the extent allegations contained in Paragraph 295 pertain to Cortland, they are denied.

296. As to allegations contained in Paragraph 296 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 296, and, on that basis, denies them. To the extent allegations contained in Paragraph 296 pertain to Cortland, they are denied.

297. As to allegations contained in Paragraph 297 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 297, and, on that basis, denies them. To the extent allegations contained in Paragraph 297 pertain to Cortland, they are denied.

298. To the extent that the allegations in Paragraph 298 purport to quote from or interpret portions of a document, that document speaks for itself. To the extent the allegations in Paragraph 298 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 298 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 298, and, on that basis, denies them. To the extent allegations contained in Paragraph 298 pertain to Cortland, they are denied.

299. To the extent that the allegations in Paragraph 299 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 299 that pertain to other Defendants or third parties, Cortland lacks knowledge or information

sufficient to form a belief as to the truth of the allegations in Paragraph 299, and, on that basis, denies them. To the extent allegations contained in Paragraph 299 pertain to Cortland, they are denied.

300. To the extent that the allegations in Paragraph 300 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 300 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 300, and, on that basis, denies them. To the extent allegations contained in Paragraph 300 pertain to Cortland, they are denied.

301. As to allegations contained in Paragraph 301 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 301, and, on that basis, denies them. To the extent allegations contained in Paragraph 301 pertain to Cortland, they are denied.

302. To the extent that the allegations in Paragraph 302 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 302 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 302, and, on that basis, denies them. To the extent allegations contained in Paragraph 302 pertain to Cortland, they are denied.

303. To the extent that the allegations in Paragraph 303 purport to quote from or interpret portions of a document, that document speaks for itself. To the extent the allegations in Paragraph 303 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 303 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 303, and, on that basis, denies them. To the extent allegations contained in Paragraph 303 pertain to Cortland, they are denied.

304. To the extent that the allegations in Paragraph 304 purport to quote from or interpret portions of a document, that document speaks for itself. To the extent the allegations in Paragraph 304 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 304 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 304, and, on that basis, denies them. To the extent allegations contained in Paragraph 304 pertain to Cortland, they are denied.

305. To the extent that the allegations in Paragraph 305 purport to quote from or interpret portions of a document, that document speaks for itself. To the extent the allegations in Paragraph 305 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 305 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 305, and, on that basis, denies them. To the extent allegations contained in Paragraph 305 pertain to Cortland, they are denied.

306. To the extent the allegations in Paragraph 306 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 306 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 306, and, on that basis, denies them. To the extent allegations contained in Paragraph 306 pertain to Cortland, they are denied.

307. As to allegations contained in Paragraph 307 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 307, and, on that basis, denies them. To the extent allegations contained in Paragraph 307 pertain to Cortland, they are denied.

308. As to allegations contained in Paragraph 308 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 308, and, on that basis, denies them. To the extent allegations contained in Paragraph 308 pertain to Cortland, they are denied.

309. To the extent that the allegations in Paragraph 309 purport to quote from or interpret portions of a document, that document speaks for itself. To the extent the allegations in Paragraph 309 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 309 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 309, and, on that basis, denies them. To the extent allegations contained in Paragraph 309 pertain to Cortland, they are denied.

310. To the extent that the allegations in Paragraph 310 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 310 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 310, and, on that basis, denies them. To the extent allegations contained in Paragraph 310 pertain to Cortland, they are denied.

311. To the extent the allegations in Paragraph 311 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 311 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 311, and, on that basis, denies them. To the extent allegations contained in Paragraph 311 pertain to Cortland, they are denied.

312. To the extent the allegations in Paragraph 312 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 312

that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 312, and, on that basis, denies them. To the extent allegations contained in Paragraph 312 pertain to Cortland, they are denied.

**F. Property Owners and Managers Conspired Through Trade Associations to Standardize Lease Terms Unfavorable to Plaintiffs and Members of the Class.**

313. To the extent the allegations in Paragraph 313 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 313 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 313, and, on that basis, denies them. To the extent allegations contained in Paragraph 313 pertain to Cortland, they are denied.

314. To the extent that the allegations in Paragraph 314 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 314 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 314, and, on that basis, denies them. To the extent allegations contained in Paragraph 314 pertain to Cortland, they are denied.

315. To the extent that the allegations in Paragraph 315 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 315 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 315, and, on that basis, denies them. To the extent allegations contained in Paragraph 315 pertain to Cortland, they are denied.

316. To the extent that the allegations in Paragraph 316 purport to quote from or interpret portions of a document, that document speaks for itself. To the extent the allegations in Paragraph 316 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 316 that pertain to other Defendants or third parties, Cortland lacks

knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 316, and, on that basis, denies them. To the extent allegations contained in Paragraph 316 pertain to Cortland, they are denied.

317. To the extent that the allegations in Paragraph 317 purport to quote from or interpret portions of a document, that document speaks for itself. To the extent the allegations in Paragraph 317 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 317 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 317, and, on that basis, denies them. To the extent allegations contained in Paragraph 317 pertain to Cortland, they are denied.

318. To the extent that the allegations in Paragraph 318 purport to quote from or interpret portions of a document, that document speaks for itself. To the extent the allegations in Paragraph 318 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 318 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 318, and, on that basis, denies them. To the extent allegations contained in Paragraph 318 pertain to Cortland, they are denied.

319. To the extent that the allegations in Paragraph 319 purport to quote from or interpret portions of a document, that document speaks for itself. To the extent the allegations in Paragraph 319 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 319 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph



319, and, on that basis, denies them. To the extent allegations contained in Paragraph 319 pertain to Cortland, they are denied.

320. To the extent that the allegations in Paragraph 320 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 320 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 320, and, on that basis, denies them. To the extent allegations contained in Paragraph 320 pertain to Cortland, they are denied.

321. To the extent that the allegations in Paragraph 321 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 321 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 321, and, on that basis, denies them. To the extent allegations contained in Paragraph 321 pertain to Cortland, they are denied.

322. To the extent that the allegations in Paragraph 322 purport to quote from or interpret portions of a document, that document speaks for itself. To the extent the allegations in Paragraph 322 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 322 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 322, and, on that basis, denies them. To the extent allegations contained in Paragraph 322 pertain to Cortland, they are denied.

323. To the extent that the allegations in Paragraph 323 purport to quote from or interpret portions of a document, that document speaks for itself. To the extent the allegations in Paragraph 323 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 323 that pertain to other Defendants or third parties, Cortland lacks

knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 323, and, on that basis, denies them. To the extent allegations contained in Paragraph 323 pertain to Cortland, they are denied.

324. To the extent that the allegations in Paragraph 324 purport to quote from or interpret portions of a document, that document speaks for itself. To the extent the allegations in Paragraph 324 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 324 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 324, and, on that basis, denies them. To the extent allegations contained in Paragraph 324 pertain to Cortland, they are denied.

325. To the extent that the allegations in Paragraph 325 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 325 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 325, and, on that basis, denies them. To the extent allegations contained in Paragraph 325 pertain to Cortland, they are denied.

326. To the extent that the allegations in Paragraph 326 purport to quote from or interpret portions of a document, that document speaks for itself. To the extent the allegations in Paragraph 326 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 326 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 326, and, on that basis, denies them. To the extent allegations contained in Paragraph 326 pertain to Cortland, they are denied.

327. To the extent that the allegations in Paragraph 327 purport to quote from or interpret portions of a document, that document speaks for itself. To the extent the allegations in Paragraph 327 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 327 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 327, and, on that basis, denies them. To the extent allegations contained in Paragraph 327 pertain to Cortland, they are denied.

328. To the extent that the allegations in Paragraph 328 purport to quote from or interpret portions of a document, that document speaks for itself. To the extent the allegations in Paragraph 328 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 328 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 328, and, on that basis, denies them. To the extent allegations contained in Paragraph 328 pertain to Cortland, they are denied.

329. To the extent that the allegations in Paragraph 329 purport to quote from or interpret portions of a document, that document speaks for itself. To the extent the allegations in Paragraph 329 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 329 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 329, and, on that basis, denies them. To the extent allegations contained in Paragraph 329 pertain to Cortland, they are denied.

330. To the extent that the allegations in Paragraph 330 purport to quote from or interpret portions of a document, that document speaks for itself. To the extent the allegations in Paragraph

330 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 330 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 330, and, on that basis, denies them. To the extent allegations contained in Paragraph 330 pertain to Cortland, they are denied.

331. To the extent that the allegations in Paragraph 331 purport to quote from or interpret portions of a document, that document speaks for itself. To the extent the allegations in Paragraph 331 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 331 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 331, and, on that basis, denies them. To the extent allegations contained in Paragraph 331 pertain to Cortland, they are denied.

**G. Preliminary Economic Analysis Confirms the Impact of RealPage's Revenue Management on Multifamily Rental Markets Nationwide.**

332. To the extent that the allegations in Paragraph 332 purport to quote from or interpret portions of a document, that document speaks for itself. To the extent the allegations in Paragraph 332 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 332 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 332, and, on that basis, denies them. To the extent allegations contained in Paragraph 332 pertain to Cortland, they are denied.

**i. Defendants' Increased Revenues Resulted from Proportionally Higher, Artificially Inflated Rent Increases.**

333. To the extent that the allegations in Paragraph 333 purport to quote from or interpret portions of a document, that document speaks for itself. To the extent the allegations in Paragraph 333 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 333 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 333, and, on that basis, denies them. To the extent allegations contained in Paragraph 333 pertain to Cortland, they are denied.

334. To the extent that the allegations in Paragraph 334 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 334 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 334, and, on that basis, denies them. To the extent allegations contained in Paragraph 334 pertain to Cortland, they are denied.

335. To the extent that the allegations in Paragraph 335 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 335 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 335, and, on that basis, denies them. To the extent allegations contained in Paragraph 335 pertain to Cortland, they are denied.

336. To the extent the allegations in Paragraph 336 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 336 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 336, and, on that basis, denies them. To the extent allegations contained in Paragraph 336 pertain to Cortland, they are denied.

**ii. Owners, Owner-Operators, and Managing Defendants Engaged in Tacit Collusion to Artificially Increase Multifamily Rental Prices.**

337. To the extent that the allegations in Paragraph 337 purport to quote from or interpret portions of a document, that document speaks for itself. To the extent the allegations in Paragraph 337 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 337 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 337, and, on that basis, denies them. To the extent allegations contained in Paragraph 337 pertain to Cortland, they are denied.

338. To the extent that the allegations in Paragraph 338 purport to quote from or interpret portions of a document, that document speaks for itself. To the extent the allegations in Paragraph 338 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 338 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 338, and, on that basis, denies them. To the extent allegations contained in Paragraph 338 pertain to Cortland, they are denied.

339. To the extent the allegations in Paragraph 339 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 339 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 339 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 339, and, on that basis, denies them. To the extent allegations contained in Paragraph 339 pertain to Cortland, they are denied.

340. To the extent the allegations in Paragraph 340 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph

340 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 340 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 340, and, on that basis, denies them. To the extent allegations contained in Paragraph 340 pertain to Cortland, they are denied.

341. To the extent the allegations in Paragraph 341 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 341 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 341 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 341, and, on that basis, denies them. To the extent allegations contained in Paragraph 341 pertain to Cortland, they are denied.

342. To the extent the allegations in Paragraph 342 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 342 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 342 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 342, and, on that basis, denies them. To the extent allegations contained in Paragraph 342 pertain to Cortland, they are denied.

343. To the extent the allegations in Paragraph 343 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 343 purport to quote from or interpret portions of a document, that document speaks for itself. As

to allegations contained in Paragraph 343 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 343, and, on that basis, denies them. To the extent allegations contained in Paragraph 343 pertain to Cortland, they are denied.

344. To the extent the allegations in Paragraph 344 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 344 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 344 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 344, and, on that basis, denies them. To the extent allegations contained in Paragraph 344 pertain to Cortland, they are denied.

345. To the extent the allegations in Paragraph 345 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 345 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 345 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 345, and, on that basis, denies them. To the extent allegations contained in Paragraph 345 pertain to Cortland, they are denied.

346. To the extent the allegations in Paragraph 346 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 346 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 346 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in



Paragraph 346, and, on that basis, denies them. To the extent allegations contained in Paragraph 346 pertain to Cortland, they are denied.

347. To the extent the allegations in Paragraph 347 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 347 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 347 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 347, and, on that basis, denies them. To the extent allegations contained in Paragraph 347 pertain to Cortland, they are denied.

348. To the extent the allegations in Paragraph 348 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 348 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 348 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 348, and, on that basis, denies them. To the extent allegations contained in Paragraph 348 pertain to Cortland, they are denied.

349. To the extent the allegations in Paragraph 349 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 349 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 349, and, on that basis, denies them. To the extent allegations contained in Paragraph 349 pertain to Cortland, they are denied.

350. To the extent the allegations in Paragraph 350 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 350

that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 350, and, on that basis, denies them. To the extent allegations contained in Paragraph 350 pertain to Cortland, they are denied.

**iii. Supply and Demand Factors Do Not Explain Inflated Rental Prices.**

351. To the extent the allegations in Paragraph 351 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 351 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 351, and, on that basis, denies them. To the extent allegations contained in Paragraph 351 pertain to Cortland, they are denied.

352. To the extent the allegations in Paragraph 352 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 352 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 352 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 352, and, on that basis, denies them. To the extent allegations contained in Paragraph 352 pertain to Cortland, they are denied.

353. To the extent the allegations in Paragraph 353 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 353 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 353 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 353, and, on that basis, denies them. To the extent allegations contained in Paragraph 353 pertain to Cortland, they are denied.

354. To the extent the allegations in Paragraph 354 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 354 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 354 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 354, and, on that basis, denies them. To the extent allegations contained in Paragraph 354 pertain to Cortland, they are denied.

**iv. Atlanta Submarket.**

355. To the extent that the allegations in Paragraph 355 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 355 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 355, and, on that basis, denies them. To the extent allegations contained in Paragraph 355 pertain to Cortland, they are denied.

356. To the extent that the allegations in Paragraph 356 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 356 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 356, and, on that basis, denies them. To the extent allegations contained in Paragraph 356 pertain to Cortland, they are denied.

357. To the extent that the allegations in Paragraph 357 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 357 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 357, and, on that basis, denies them. To the extent allegations contained in Paragraph 357 pertain to Cortland, they are denied.

358. To the extent the allegations in Paragraph 358 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 358 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 358 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 358, and, on that basis, denies them. To the extent allegations contained in Paragraph 358 pertain to Cortland, they are denied.

359. To the extent the allegations in Paragraph 359 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 359 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 359 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 359, and, on that basis, denies them. To the extent allegations contained in Paragraph 359 pertain to Cortland, they are denied.

360. To the extent the allegations in Paragraph 360 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 360 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 360 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 360, and, on that basis, denies them. To the extent allegations contained in Paragraph 360 pertain to Cortland, they are denied.

**v. Orlando Submarket.**

361. To the extent the allegations in Paragraph 361 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 361 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 361 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 361, and, on that basis, denies them. To the extent allegations contained in Paragraph 361 pertain to Cortland, they are denied.

**vi. Phoenix Submarket.**

362. To the extent the allegations in Paragraph 362 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 362 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 362 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 362, and, on that basis, denies them. To the extent allegations contained in Paragraph 362 pertain to Cortland, they are denied.

**vii. Fort Worth (Dallas Submarket).**

363. To the extent the allegations in Paragraph 363 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 363 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 363 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 363, and, on that basis, denies them. To the extent allegations contained in Paragraph 363 pertain to Cortland, they are denied.

364. To the extent the allegations in Paragraph 364 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 364 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 364 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 364, and, on that basis, denies them. To the extent allegations contained in Paragraph 364 pertain to Cortland, they are denied.

365. To the extent the allegations in Paragraph 365 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 365 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 365 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 365, and, on that basis, denies them. To the extent allegations contained in Paragraph 365 pertain to Cortland, they are denied.

**H. “Plus Factors” in the Multifamily Rental Housing Market Provide Additional Evidence of a Price Fixing Conspiracy.**

366. To the extent the allegations in Paragraph 366 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 366 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 366 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 366, and, on that basis, denies them. To the extent allegations contained in Paragraph 366 pertain to Cortland, they are denied.

367. To the extent the allegations in Paragraph 367 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 367 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 367, and, on that basis, denies them. To the extent allegations contained in Paragraph 367 pertain to Cortland, they are denied.

**i. The Multifamily Rental Market Is Highly Concentrated.**

368. To the extent the allegations in Paragraph 368 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 368 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 368 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 368, and, on that basis, denies them. To the extent allegations contained in Paragraph 368 pertain to Cortland, they are denied.

**ii. High Barriers to Entry.**

369. To the extent the allegations in Paragraph 369 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 369 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 369, and, on that basis, denies them. To the extent allegations contained in Paragraph 369 pertain to Cortland, they are denied.

370. To the extent the allegations in Paragraph 370 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 370 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient

to form a belief as to the truth of the allegations in Paragraph 370, and, on that basis, denies them. To the extent allegations contained in Paragraph 370 pertain to Cortland, they are denied.

371. To the extent the allegations in Paragraph 371 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 371 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 371, and, on that basis, denies them. To the extent allegations contained in Paragraph 371 pertain to Cortland, they are denied.

**iii. High Switching Costs for Renters**

372. To the extent the allegations in Paragraph 372 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 372 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 372, and, on that basis, denies them. To the extent allegations contained in Paragraph 372 pertain to Cortland, they are denied.

373. To the extent the allegations in Paragraph 373 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 373 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 373, and, on that basis, denies them. To the extent allegations contained in Paragraph 373 pertain to Cortland, they are denied.

374. To the extent the allegations in Paragraph 374 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 374 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 374, and, on that basis, denies them. To the extent allegations contained in Paragraph 374 pertain to Cortland, they are denied.



**iv. Inelasticity of Demand.**

375. To the extent the allegations in Paragraph 375 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 375 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 375, and, on that basis, denies them. To the extent allegations contained in Paragraph 375 pertain to Cortland, they are denied.

376. To the extent the allegations in Paragraph 376 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 376 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 376, and, on that basis, denies them. To the extent allegations contained in Paragraph 376 pertain to Cortland, they are denied.

**v. Multifamily Rental Housing Units Are a Fungible Product.**

377. As to allegations contained in Paragraph 377 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 377, and, on that basis, denies them. To the extent allegations contained in Paragraph 377 pertain to Cortland, they are denied.

378. To the extent the allegations in Paragraph 378 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 378 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 378 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 378, and, on that basis, denies them. To the extent allegations contained in Paragraph 378 pertain to Cortland, they are denied.

379. To the extent that the allegations in Paragraph 379 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 379 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 379, and, on that basis, denies them. To the extent allegations contained in Paragraph 379 pertain to Cortland, they are denied.

**vi. Defendants Exchange Competitively Sensitive Information.**

380. To the extent the allegations in Paragraph 380 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 380 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 380 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 380, and, on that basis, denies them. To the extent allegations contained in Paragraph 380 pertain to Cortland, they are denied.

**vii. Motive, Opportunities, and Invitations to Collude.**

381. To the extent the allegations in Paragraph 381 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 381 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 381 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 381, and, on that basis, denies them. To the extent allegations contained in Paragraph 381 pertain to Cortland, they are denied.

382. To the extent the allegations in Paragraph 382 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 299

that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 382, and, on that basis, denies them. To the extent allegations contained in Paragraph 382 pertain to Cortland, they are denied.

383. To the extent the allegations in Paragraph 383 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 383 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 383 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 383, and, on that basis, denies them. To the extent allegations contained in Paragraph 383 pertain to Cortland, they are denied.

384. To the extent the allegations in Paragraph 384 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 384 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 384 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 384, and, on that basis, denies them. To the extent allegations contained in Paragraph 384 pertain to Cortland, they are denied.

385. To the extent the allegations in Paragraph 385 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 385 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 385 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in

Paragraph 385, and, on that basis, denies them. To the extent allegations contained in Paragraph 385 pertain to Cortland, they are denied.

386. To the extent the allegations in Paragraph 386 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 386 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 386, and, on that basis, denies them. To the extent allegations contained in Paragraph 386 pertain to Cortland, they are denied.

387. To the extent the allegations in Paragraph 387 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 387 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 387 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 387, and, on that basis, denies them. To the extent allegations contained in Paragraph 387 pertain to Cortland, they are denied.

388. To the extent the allegations in Paragraph 388 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 388 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 388 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 388, and, on that basis, denies them. To the extent allegations contained in Paragraph 388 pertain to Cortland, they are denied.

389. To the extent the allegations in Paragraph 389 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 389

that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 389, and, on that basis, denies them. To the extent allegations contained in Paragraph 389 pertain to Cortland, they are denied.

390. As to allegations contained in Paragraph 390 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 390, and, on that basis, denies them. To the extent allegations contained in Paragraph 390 pertain to Cortland, they are denied.

391. As to allegations contained in Paragraph 391 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 391, and, on that basis, denies them. To the extent allegations contained in Paragraph 391 pertain to Cortland, they are denied.

## **VI. RELEVANT MARKET**

392. To the extent the allegations in Paragraph 392 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 392 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 392, and, on that basis, denies them. To the extent allegations contained in Paragraph 392 pertain to Cortland, they are denied.

393. To the extent the allegations in Paragraph 393 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 393 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 393, and, on that basis, denies them. To the extent allegations contained in Paragraph 393 pertain to Cortland, they are denied.

### **A. The Relevant Product Market Is Multifamily Residential Real Estate Leases.**

394. To the extent the allegations in Paragraph 394 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 394 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 394, and, on that basis, denies them. To the extent allegations contained in Paragraph 394 pertain to Cortland, they are denied.

395. As to allegations contained in Paragraph 395 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 395, and, on that basis, denies them. To the extent allegations contained in Paragraph 395 pertain to Cortland, they are denied.

396. As to allegations contained in Paragraph 396 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 396, and, on that basis, denies them. To the extent allegations contained in Paragraph 396 pertain to Cortland, they are denied.

397. To the extent the allegations in Paragraph 397 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 397 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 397 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 397, and, on that basis, denies them. To the extent allegations contained in Paragraph 397 pertain to Cortland, they are denied.

398. To the extent the allegations in Paragraph 398 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 398 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient

to form a belief as to the truth of the allegations in Paragraph 398, and, on that basis, denies them. To the extent allegations contained in Paragraph 398 pertain to Cortland, they are denied.

399. To the extent the allegations in Paragraph 399 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 399 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 399 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 399, and, on that basis, denies them. To the extent allegations contained in Paragraph 399 pertain to Cortland, they are denied.

**B. Defendants' Market Power in the Multifamily Residential Real Estate Market.**

400. To the extent the allegations in Paragraph 400 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 400 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 400, and, on that basis, denies them. To the extent allegations contained in Paragraph 400 pertain to Cortland, they are denied.

401. To the extent the allegations in Paragraph 401 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 401 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 401, and, on that basis, denies them. To the extent allegations contained in Paragraph 401 pertain to Cortland, they are denied.

402. To the extent the allegations in Paragraph 402 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 402 purport to quote from or interpret portions of a document, that document speaks for itself. As

to allegations contained in Paragraph 402 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 402, and, on that basis, denies them. To the extent allegations contained in Paragraph 402 pertain to Cortland, they are denied.

403. To the extent the allegations in Paragraph 403 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 403 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 403, and, on that basis, denies them. To the extent allegations contained in Paragraph 403 pertain to Cortland, they are denied.

404. To the extent the allegations in Paragraph 404 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 404 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 404, and, on that basis, denies them. To the extent allegations contained in Paragraph 404 pertain to Cortland, they are denied.

### **C. Regional Submarkets**

405. To the extent the allegations in Paragraph 405 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 405 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 405, and, on that basis, denies them. To the extent allegations contained in Paragraph 405 pertain to Cortland, they are denied.

406. To the extent the allegations in Paragraph 406 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 406 purport to quote from or interpret portions of a document, that document speaks for itself. As



to allegations contained in Paragraph 406 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 406, and, on that basis, denies them. To the extent allegations contained in Paragraph 406 pertain to Cortland, they are denied.

407. To the extent the allegations in Paragraph 407 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 407 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 407 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 407, and, on that basis, denies them. To the extent allegations contained in Paragraph 407 pertain to Cortland, they are denied.

408. To the extent the allegations in Paragraph 408 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 408 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 408, and, on that basis, denies them. To the extent allegations contained in Paragraph 408 pertain to Cortland, they are denied.

409. To the extent the allegations in Paragraph 409 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 409 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 409 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 409, and, on that basis, denies them. To the extent allegations contained in Paragraph 409 pertain to Cortland, they are denied.

**i. Nashville, Tennessee**

410. To the extent the allegations in Paragraph 410 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 410 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 410 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 410, and, on that basis, denies them. To the extent allegations contained in Paragraph 410 pertain to Cortland, they are denied.

411. To the extent the allegations in Paragraph 411 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 411 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 411 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 411, and, on that basis, denies them. To the extent allegations contained in Paragraph 411 pertain to Cortland, they are denied.

412. To the extent the allegations in Paragraph 412 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 412 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 412, and, on that basis, denies them. To the extent allegations contained in Paragraph 412 pertain to Cortland, they are denied.

413. To the extent the allegations in Paragraph 413 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 413 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient

to form a belief as to the truth of the allegations in Paragraph 413, and, on that basis, denies them. To the extent allegations contained in Paragraph 413 pertain to Cortland, they are denied.

414. To the extent the allegations in Paragraph 414 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 414 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 414, and, on that basis, denies them. To the extent allegations contained in Paragraph 414 pertain to Cortland, they are denied.

415. To the extent the allegations in Paragraph 415 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 415 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 415, and, on that basis, denies them. To the extent allegations contained in Paragraph 415 pertain to Cortland, they are denied.

**ii. Atlanta, Georgia**

416. To the extent the allegations in Paragraph 416 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 416 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 416 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 416, and, on that basis, denies them. To the extent allegations contained in Paragraph 416 pertain to Cortland, they are denied.

417. To the extent the allegations in Paragraph 417 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 417 purport to quote from or interpret portions of a document, that document speaks for itself. As

to allegations contained in Paragraph 417 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 417, and, on that basis, denies them. To the extent allegations contained in Paragraph 417 pertain to Cortland, they are denied.

418. To the extent the allegations in Paragraph 418 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 418 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 418, and, on that basis, denies them. To the extent allegations contained in Paragraph 418 pertain to Cortland, they are denied.

419. To the extent the allegations in Paragraph 419 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 419 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 419, and, on that basis, denies them. To the extent allegations contained in Paragraph 419 pertain to Cortland, they are denied.

420. To the extent the allegations in Paragraph 420 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 420 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 420, and, on that basis, denies them. To the extent allegations contained in Paragraph 420 pertain to Cortland, they are denied.

421. To the extent the allegations in Paragraph 421 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 421 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient

to form a belief as to the truth of the allegations in Paragraph 421, and, on that basis, denies them. To the extent allegations contained in Paragraph 421 pertain to Cortland, they are denied.

**iii. Austin, Texas**

422. To the extent the allegations in Paragraph 422 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 422 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 422 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 422, and, on that basis, denies them. To the extent allegations contained in Paragraph 422 pertain to Cortland, they are denied.

423. To the extent the allegations in Paragraph 423 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 423 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 423 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 423, and, on that basis, denies them. To the extent allegations contained in Paragraph 423 pertain to Cortland, they are denied.

424. To the extent the allegations in Paragraph 424 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 424 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 424, and, on that basis, denies them. To the extent allegations contained in Paragraph 424 pertain to Cortland, they are denied.

425. To the extent the allegations in Paragraph 425 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 425 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 425, and, on that basis, denies them. To the extent allegations contained in Paragraph 425 pertain to Cortland, they are denied.

426. To the extent the allegations in Paragraph 426 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 426 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 426, and, on that basis, denies them. To the extent allegations contained in Paragraph 426 pertain to Cortland, they are denied.

427. To the extent the allegations in Paragraph 427 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 427 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 427, and, on that basis, denies them. To the extent allegations contained in Paragraph 427 pertain to Cortland, they are denied.

**iv. Baltimore, Maryland**

428. To the extent the allegations in Paragraph 428 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 428 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 428 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 428, and, on that basis, denies them. To the extent allegations contained in Paragraph 428 pertain to Cortland, they are denied.

429. To the extent the allegations in Paragraph 429 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 429 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 429 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 429, and, on that basis, denies them. To the extent allegations contained in Paragraph 429 pertain to Cortland, they are denied.

430. To the extent the allegations in Paragraph 430 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 430 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 430, and, on that basis, denies them. To the extent allegations contained in Paragraph 430 pertain to Cortland, they are denied.

431. To the extent the allegations in Paragraph 431 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 431 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 431, and, on that basis, denies them. To the extent allegations contained in Paragraph 431 pertain to Cortland, they are denied.

432. To the extent the allegations in Paragraph 432 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 432 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 432, and, on that basis, denies them. To the extent allegations contained in Paragraph 432 pertain to Cortland, they are denied.

433. To the extent the allegations in Paragraph 433 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 433 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 433, and, on that basis, denies them. To the extent allegations contained in Paragraph 433 pertain to Cortland, they are denied.

434. To the extent the allegations in Paragraph 434 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 434 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 434, and, on that basis, denies them. To the extent allegations contained in Paragraph 434 pertain to Cortland, they are denied.

**v. Boston, Massachusetts**

435. To the extent the allegations in Paragraph 435 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 435 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 435 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 435, and, on that basis, denies them. To the extent allegations contained in Paragraph 435 pertain to Cortland, they are denied.

436. To the extent the allegations in Paragraph 436 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 436 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 436 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in



Paragraph 436, and, on that basis, denies them. To the extent allegations contained in Paragraph 436 pertain to Cortland, they are denied.

437. To the extent the allegations in Paragraph 437 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 437 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 437, and, on that basis, denies them. To the extent allegations contained in Paragraph 437 pertain to Cortland, they are denied.

438. To the extent the allegations in Paragraph 438 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 438 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 438, and, on that basis, denies them. To the extent allegations contained in Paragraph 438 pertain to Cortland, they are denied.

439. To the extent the allegations in Paragraph 439 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 439 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 439, and, on that basis, denies them. To the extent allegations contained in Paragraph 439 pertain to Cortland, they are denied.

440. To the extent the allegations in Paragraph 440 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 440 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 440, and, on that basis, denies them. To the extent allegations contained in Paragraph 440 pertain to Cortland, they are denied.

441. To the extent the allegations in Paragraph 441 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 441 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 441, and, on that basis, denies them. To the extent allegations contained in Paragraph 441 pertain to Cortland, they are denied.

**vi. Charlotte, North Carolina**

442. To the extent the allegations in Paragraph 442 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 442 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 442 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 442, and, on that basis, denies them. To the extent allegations contained in Paragraph 442 pertain to Cortland, they are denied.

443. To the extent the allegations in Paragraph 443 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 443 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 443 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 443, and, on that basis, denies them. To the extent allegations contained in Paragraph 443 pertain to Cortland, they are denied.

444. To the extent the allegations in Paragraph 444 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 444 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient

to form a belief as to the truth of the allegations in Paragraph 444, and, on that basis, denies them. To the extent allegations contained in Paragraph 444 pertain to Cortland, they are denied.

445. To the extent the allegations in Paragraph 445 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 445 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 445, and, on that basis, denies them. To the extent allegations contained in Paragraph 445 pertain to Cortland, they are denied.

446. To the extent the allegations in Paragraph 446 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 446 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 446, and, on that basis, denies them. To the extent allegations contained in Paragraph 446 pertain to Cortland, they are denied.

447. To the extent the allegations in Paragraph 447 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 447 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 447, and, on that basis, denies them. To the extent allegations contained in Paragraph 447 pertain to Cortland, they are denied.

**vii. Chicago, Illinois**

448. To the extent the allegations in Paragraph 448 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 448 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 448 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in

Paragraph 448, and, on that basis, denies them. To the extent allegations contained in Paragraph 448 pertain to Cortland, they are denied.

449. To the extent the allegations in Paragraph 449 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 449 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 449 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 449, and, on that basis, denies them. To the extent allegations contained in Paragraph 449 pertain to Cortland, they are denied.

450. To the extent the allegations in Paragraph 450 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 450 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 450, and, on that basis, denies them. To the extent allegations contained in Paragraph 450 pertain to Cortland, they are denied.

451. To the extent the allegations in Paragraph 451 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 451 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 451, and, on that basis, denies them. To the extent allegations contained in Paragraph 451 pertain to Cortland, they are denied.

452. To the extent the allegations in Paragraph 452 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 452 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient

to form a belief as to the truth of the allegations in Paragraph 452, and, on that basis, denies them. To the extent allegations contained in Paragraph 452 pertain to Cortland, they are denied.

453. To the extent the allegations in Paragraph 453 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 453 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 453, and, on that basis, denies them. To the extent allegations contained in Paragraph 453 pertain to Cortland, they are denied.

**viii. Dallas, Texas**

454. To the extent the allegations in Paragraph 454 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 454 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 454 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 454, and, on that basis, denies them. To the extent allegations contained in Paragraph 454 pertain to Cortland, they are denied.

455. To the extent the allegations in Paragraph 455 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 455 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 455 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 455, and, on that basis, denies them. To the extent allegations contained in Paragraph 455 pertain to Cortland, they are denied.

456. To the extent the allegations in Paragraph 456 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 456 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 456, and, on that basis, denies them. To the extent allegations contained in Paragraph 456 pertain to Cortland, they are denied.

457. To the extent the allegations in Paragraph 457 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 457 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 457, and, on that basis, denies them. To the extent allegations contained in Paragraph 457 pertain to Cortland, they are denied.

458. To the extent the allegations in Paragraph 458 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 458 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 458, and, on that basis, denies them. To the extent allegations contained in Paragraph 458 pertain to Cortland, they are denied.

459. To the extent the allegations in Paragraph 459 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 459 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 459, and, on that basis, denies them. To the extent allegations contained in Paragraph 459 pertain to Cortland, they are denied.

**ix. Denver, Colorado**

460. To the extent the allegations in Paragraph 460 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph

460 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 460 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 460, and, on that basis, denies them. To the extent allegations contained in Paragraph 460 pertain to Cortland, they are denied.

461. To the extent the allegations in Paragraph 461 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 461 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 461 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 461, and, on that basis, denies them. To the extent allegations contained in Paragraph 461 pertain to Cortland, they are denied.

462. To the extent the allegations in Paragraph 462 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 462 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 462, and, on that basis, denies them. To the extent allegations contained in Paragraph 462 pertain to Cortland, they are denied.

463. To the extent the allegations in Paragraph 463 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 463 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 463, and, on that basis, denies them. To the extent allegations contained in Paragraph 463 pertain to Cortland, they are denied.

464. To the extent the allegations in Paragraph 464 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 464 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 464, and, on that basis, denies them. To the extent allegations contained in Paragraph 464 pertain to Cortland, they are denied.

465. To the extent the allegations in Paragraph 465 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 465 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 465, and, on that basis, denies them. To the extent allegations contained in Paragraph 465 pertain to Cortland, they are denied.

466. To the extent the allegations in Paragraph 466 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 466 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 466, and, on that basis, denies them. To the extent allegations contained in Paragraph 466 pertain to Cortland, they are denied.

**x. Detroit, Michigan**

467. To the extent the allegations in Paragraph 467 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 467 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 467 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 467, and, on that basis, denies them. To the extent allegations contained in Paragraph 467 pertain to Cortland, they are denied.



468. To the extent the allegations in Paragraph 468 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 468 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 468 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 468, and, on that basis, denies them. To the extent allegations contained in Paragraph 468 pertain to Cortland, they are denied.

469. To the extent the allegations in Paragraph 469 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 469 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 469, and, on that basis, denies them. To the extent allegations contained in Paragraph 469 pertain to Cortland, they are denied.

470. To the extent the allegations in Paragraph 470 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 470 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 470, and, on that basis, denies them. To the extent allegations contained in Paragraph 470 pertain to Cortland, they are denied.

471. To the extent the allegations in Paragraph 471 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 471 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 471, and, on that basis, denies them. To the extent allegations contained in Paragraph 471 pertain to Cortland, they are denied.

472. To the extent the allegations in Paragraph 472 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 472 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 472, and, on that basis, denies them. To the extent allegations contained in Paragraph 472 pertain to Cortland, they are denied.

**xi. Houston, Texas**

473. To the extent the allegations in Paragraph 473 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 473 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 473 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 473, and, on that basis, denies them. To the extent allegations contained in Paragraph 473 pertain to Cortland, they are denied.

474. To the extent the allegations in Paragraph 474 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 474 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 474 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 474, and, on that basis, denies them. To the extent allegations contained in Paragraph 474 pertain to Cortland, they are denied.

475. To the extent the allegations in Paragraph 475 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 475 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient

to form a belief as to the truth of the allegations in Paragraph 475, and, on that basis, denies them. To the extent allegations contained in Paragraph 475 pertain to Cortland, they are denied.

476. To the extent the allegations in Paragraph 476 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 476 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 476, and, on that basis, denies them. To the extent allegations contained in Paragraph 476 pertain to Cortland, they are denied.

477. To the extent the allegations in Paragraph 477 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 477 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 477, and, on that basis, denies them. To the extent allegations contained in Paragraph 477 pertain to Cortland, they are denied.

478. To the extent the allegations in Paragraph 478 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 478 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 478, and, on that basis, denies them. To the extent allegations contained in Paragraph 478 pertain to Cortland, they are denied.

**xii. Jacksonville, Florida**

479. To the extent the allegations in Paragraph 479 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 479 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 479 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in

Paragraph 479, and, on that basis, denies them. To the extent allegations contained in Paragraph 479 pertain to Cortland, they are denied.

480. To the extent the allegations in Paragraph 480 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 480 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 480 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 480, and, on that basis, denies them. To the extent allegations contained in Paragraph 480 pertain to Cortland, they are denied.

481. To the extent the allegations in Paragraph 481 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 481 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 481, and, on that basis, denies them. To the extent allegations contained in Paragraph 481 pertain to Cortland, they are denied.

482. To the extent the allegations in Paragraph 482 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 482 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 482, and, on that basis, denies them. To the extent allegations contained in Paragraph 482 pertain to Cortland, they are denied.

483. To the extent the allegations in Paragraph 483 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 483 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient

to form a belief as to the truth of the allegations in Paragraph 483, and, on that basis, denies them. To the extent allegations contained in Paragraph 483 pertain to Cortland, they are denied.

484. To the extent the allegations in Paragraph 484 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 484 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 484, and, on that basis, denies them. To the extent allegations contained in Paragraph 484 pertain to Cortland, they are denied.

**xiii. Las Vegas, Nevada**

485. To the extent the allegations in Paragraph 485 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 485 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 485 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 485, and, on that basis, denies them. To the extent allegations contained in Paragraph 485 pertain to Cortland, they are denied.

486. To the extent the allegations in Paragraph 486 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 486 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 486 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 486, and, on that basis, denies them. To the extent allegations contained in Paragraph 486 pertain to Cortland, they are denied.

487. To the extent the allegations in Paragraph 487 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 487 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 487, and, on that basis, denies them. To the extent allegations contained in Paragraph 487 pertain to Cortland, they are denied.

488. To the extent the allegations in Paragraph 488 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 488 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 488, and, on that basis, denies them. To the extent allegations contained in Paragraph 488 pertain to Cortland, they are denied.

489. To the extent the allegations in Paragraph 489 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 489 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 489, and, on that basis, denies them. To the extent allegations contained in Paragraph 489 pertain to Cortland, they are denied.

490. To the extent the allegations in Paragraph 490 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 490 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 490, and, on that basis, denies them. To the extent allegations contained in Paragraph 490 pertain to Cortland, they are denied.

**xiv. Los Angeles, California**

491. To the extent the allegations in Paragraph 491 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph

491 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 491 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 491, and, on that basis, denies them. To the extent allegations contained in Paragraph 491 pertain to Cortland, they are denied.

492. To the extent the allegations in Paragraph 492 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 492 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 492 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 492, and, on that basis, denies them. To the extent allegations contained in Paragraph 492 pertain to Cortland, they are denied.

493. To the extent the allegations in Paragraph 493 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 493 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 493, and, on that basis, denies them. To the extent allegations contained in Paragraph 493 pertain to Cortland, they are denied.

494. To the extent the allegations in Paragraph 494 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 494 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 494, and, on that basis, denies them. To the extent allegations contained in Paragraph 494 pertain to Cortland, they are denied.

495. To the extent the allegations in Paragraph 495 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 495 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 495, and, on that basis, denies them. To the extent allegations contained in Paragraph 495 pertain to Cortland, they are denied.

496. To the extent the allegations in Paragraph 496 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 496 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 496, and, on that basis, denies them. To the extent allegations contained in Paragraph 496 pertain to Cortland, they are denied.

497. To the extent the allegations in Paragraph 497 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 497 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 497, and, on that basis, denies them. To the extent allegations contained in Paragraph 497 pertain to Cortland, they are denied.

**xv. Memphis, Tennessee**

498. To the extent the allegations in Paragraph 498 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 498 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 498 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 498, and, on that basis, denies them. To the extent allegations contained in Paragraph 498 pertain to Cortland, they are denied.



499. To the extent the allegations in Paragraph 499 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 499 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 499 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 499, and, on that basis, denies them. To the extent allegations contained in Paragraph 499 pertain to Cortland, they are denied.

500. To the extent the allegations in Paragraph 500 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 500 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 500, and, on that basis, denies them. To the extent allegations contained in Paragraph 500 pertain to Cortland, they are denied.

501. To the extent the allegations in Paragraph 501 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 501 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 501, and, on that basis, denies them. To the extent allegations contained in Paragraph 501 pertain to Cortland, they are denied.

502. To the extent the allegations in Paragraph 502 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 502 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 502, and, on that basis, denies them. To the extent allegations contained in Paragraph 502 pertain to Cortland, they are denied.

503. To the extent the allegations in Paragraph 503 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 503 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 503, and, on that basis, denies them. To the extent allegations contained in Paragraph 503 pertain to Cortland, they are denied.

**xvi. Miami, Florida**

504. To the extent the allegations in Paragraph 504 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 504 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 504 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 504, and, on that basis, denies them. To the extent allegations contained in Paragraph 504 pertain to Cortland, they are denied.

505. To the extent the allegations in Paragraph 505 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 505 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 505 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 505, and, on that basis, denies them. To the extent allegations contained in Paragraph 505 pertain to Cortland, they are denied.

506. To the extent the allegations in Paragraph 506 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 506 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient

to form a belief as to the truth of the allegations in Paragraph 506, and, on that basis, denies them. To the extent allegations contained in Paragraph 506 pertain to Cortland, they are denied.

507. To the extent the allegations in Paragraph 507 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 507 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 507, and, on that basis, denies them. To the extent allegations contained in Paragraph 507 pertain to Cortland, they are denied.

508. To the extent the allegations in Paragraph 508 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 508 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 508, and, on that basis, denies them. To the extent allegations contained in Paragraph 508 pertain to Cortland, they are denied.

509. To the extent the allegations in Paragraph 509 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 509 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 509, and, on that basis, denies them. To the extent allegations contained in Paragraph 509 pertain to Cortland, they are denied.

**xvii. Milwaukee, Wisconsin**

510. To the extent the allegations in Paragraph 510 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 510 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 510 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in

Paragraph 510, and, on that basis, denies them. To the extent allegations contained in Paragraph 510 pertain to Cortland, they are denied.

511. To the extent the allegations in Paragraph 511 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 511 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 511 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 511, and, on that basis, denies them. To the extent allegations contained in Paragraph 511 pertain to Cortland, they are denied.

512. To the extent the allegations in Paragraph 512 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 512 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 512, and, on that basis, denies them. To the extent allegations contained in Paragraph 512 pertain to Cortland, they are denied.

513. To the extent the allegations in Paragraph 513 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 513 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 513, and, on that basis, denies them. To the extent allegations contained in Paragraph 513 pertain to Cortland, they are denied.

514. To the extent the allegations in Paragraph 514 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 514 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient

to form a belief as to the truth of the allegations in Paragraph 514, and, on that basis, denies them. To the extent allegations contained in Paragraph 514 pertain to Cortland, they are denied.

515. To the extent the allegations in Paragraph 515 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 515 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 515, and, on that basis, denies them. To the extent allegations contained in Paragraph 515 pertain to Cortland, they are denied.

**xviii. Minneapolis, Minnesota**

516. To the extent the allegations in Paragraph 516 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 516 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 516 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 516, and, on that basis, denies them. To the extent allegations contained in Paragraph 516 pertain to Cortland, they are denied.

517. To the extent the allegations in Paragraph 517 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 517 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 517 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 517, and, on that basis, denies them. To the extent allegations contained in Paragraph 517 pertain to Cortland, they are denied.

518. To the extent the allegations in Paragraph 518 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 518 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 518, and, on that basis, denies them. To the extent allegations contained in Paragraph 518 pertain to Cortland, they are denied.

519. To the extent the allegations in Paragraph 519 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 519 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 519, and, on that basis, denies them. To the extent allegations contained in Paragraph 519 pertain to Cortland, they are denied.

520. To the extent the allegations in Paragraph 520 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 520 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 520, and, on that basis, denies them. To the extent allegations contained in Paragraph 520 pertain to Cortland, they are denied.

521. To the extent the allegations in Paragraph 521 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 521 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 521, and, on that basis, denies them. To the extent allegations contained in Paragraph 521 pertain to Cortland, they are denied.

#### **xix. New York, New York**

522. To the extent the allegations in Paragraph 522 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph

522 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 522 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 522, and, on that basis, denies them. To the extent allegations contained in Paragraph 522 pertain to Cortland, they are denied.

523. To the extent the allegations in Paragraph 523 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 523 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 523 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 523, and, on that basis, denies them. To the extent allegations contained in Paragraph 523 pertain to Cortland, they are denied.

524. To the extent the allegations in Paragraph 524 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 524 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 524, and, on that basis, denies them. To the extent allegations contained in Paragraph 524 pertain to Cortland, they are denied.

525. To the extent the allegations in Paragraph 525 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 525 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 525, and, on that basis, denies them. To the extent allegations contained in Paragraph 525 pertain to Cortland, they are denied.

526. To the extent the allegations in Paragraph 526 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 526 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 526, and, on that basis, denies them. To the extent allegations contained in Paragraph 526 pertain to Cortland, they are denied.

527. To the extent the allegations in Paragraph 527 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 527 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 527, and, on that basis, denies them. To the extent allegations contained in Paragraph 527 pertain to Cortland, they are denied.

528. To the extent the allegations in Paragraph 528 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 528 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 528, and, on that basis, denies them. To the extent allegations contained in Paragraph 528 pertain to Cortland, they are denied.

**xx. Orlando, Florida**

529. To the extent the allegations in Paragraph 529 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 529 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 529 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 529, and, on that basis, denies them. To the extent allegations contained in Paragraph 529 pertain to Cortland, they are denied.



530. To the extent the allegations in Paragraph 530 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 530 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 530 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 530, and, on that basis, denies them. To the extent allegations contained in Paragraph 530 pertain to Cortland, they are denied.

531. To the extent the allegations in Paragraph 531 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 531 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 531, and, on that basis, denies them. To the extent allegations contained in Paragraph 531 pertain to Cortland, they are denied.

532. To the extent the allegations in Paragraph 532 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 532 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 532, and, on that basis, denies them. To the extent allegations contained in Paragraph 532 pertain to Cortland, they are denied.

533. To the extent the allegations in Paragraph 533 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 533 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 533, and, on that basis, denies them. To the extent allegations contained in Paragraph 533 pertain to Cortland, they are denied.

534. To the extent the allegations in Paragraph 534 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 534 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 534, and, on that basis, denies them. To the extent allegations contained in Paragraph 534 pertain to Cortland, they are denied.

**xxi. Philadelphia, Pennsylvania**

535. To the extent the allegations in Paragraph 535 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 535 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 535 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 535, and, on that basis, denies them. To the extent allegations contained in Paragraph 535 pertain to Cortland, they are denied.

536. To the extent the allegations in Paragraph 536 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 536 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 536 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 536, and, on that basis, denies them. To the extent allegations contained in Paragraph 536 pertain to Cortland, they are denied.

537. To the extent the allegations in Paragraph 537 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 537 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient

to form a belief as to the truth of the allegations in Paragraph 537, and, on that basis, denies them. To the extent allegations contained in Paragraph 537 pertain to Cortland, they are denied.

538. To the extent the allegations in Paragraph 538 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 538 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 538, and, on that basis, denies them. To the extent allegations contained in Paragraph 538 pertain to Cortland, they are denied.

539. To the extent the allegations in Paragraph 539 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 539 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 539, and, on that basis, denies them. To the extent allegations contained in Paragraph 539 pertain to Cortland, they are denied.

**xxii. Phoenix, Arizona**

540. To the extent the allegations in Paragraph 540 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 540 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 540 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 540, and, on that basis, denies them. To the extent allegations contained in Paragraph 540 pertain to Cortland, they are denied.

541. To the extent the allegations in Paragraph 541 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 541 purport to quote from or interpret portions of a document, that document speaks for itself. As

to allegations contained in Paragraph 541 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 541, and, on that basis, denies them. To the extent allegations contained in Paragraph 541 pertain to Cortland, they are denied.

542. To the extent the allegations in Paragraph 542 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 542 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 542, and, on that basis, denies them. To the extent allegations contained in Paragraph 542 pertain to Cortland, they are denied.

543. To the extent the allegations in Paragraph 543 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 543 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 543, and, on that basis, denies them. To the extent allegations contained in Paragraph 543 pertain to Cortland, they are denied.

544. To the extent the allegations in Paragraph 544 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 544 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 544, and, on that basis, denies them. To the extent allegations contained in Paragraph 544 pertain to Cortland, they are denied.

545. To the extent the allegations in Paragraph 545 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 545 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient

to form a belief as to the truth of the allegations in Paragraph 545, and, on that basis, denies them. To the extent allegations contained in Paragraph 545 pertain to Cortland, they are denied.

546. To the extent the allegations in Paragraph 546 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 546 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 546, and, on that basis, denies them. To the extent allegations contained in Paragraph 546 pertain to Cortland, they are denied.

**xxiii. Pittsburgh, Pennsylvania**

547. To the extent the allegations in Paragraph 547 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 547 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 547 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 547, and, on that basis, denies them. To the extent allegations contained in Paragraph 547 pertain to Cortland, they are denied.

548. To the extent the allegations in Paragraph 548 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 548 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 548 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 548, and, on that basis, denies them. To the extent allegations contained in Paragraph 548 pertain to Cortland, they are denied.

549. To the extent the allegations in Paragraph 549 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 549 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 549, and, on that basis, denies them. To the extent allegations contained in Paragraph 549 pertain to Cortland, they are denied.

550. To the extent the allegations in Paragraph 550 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 550 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 550, and, on that basis, denies them. To the extent allegations contained in Paragraph 550 pertain to Cortland, they are denied.

551. To the extent the allegations in Paragraph 551 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 551 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 551, and, on that basis, denies them. To the extent allegations contained in Paragraph 551 pertain to Cortland, they are denied.

552. To the extent the allegations in Paragraph 552 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 552 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 552, and, on that basis, denies them. To the extent allegations contained in Paragraph 552 pertain to Cortland, they are denied.

#### **xxiv. Portland, Oregon**

553. To the extent the allegations in Paragraph 553 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph

553 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 553 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 553, and, on that basis, denies them. To the extent allegations contained in Paragraph 553 pertain to Cortland, they are denied.

554. To the extent the allegations in Paragraph 554 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 554 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 554 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 554, and, on that basis, denies them. To the extent allegations contained in Paragraph 554 pertain to Cortland, they are denied.

555. To the extent the allegations in Paragraph 555 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 555 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 555, and, on that basis, denies them. To the extent allegations contained in Paragraph 555 pertain to Cortland, they are denied.

556. To the extent the allegations in Paragraph 556 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 556 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 556, and, on that basis, denies them. To the extent allegations contained in Paragraph 556 pertain to Cortland, they are denied.

557. To the extent the allegations in Paragraph 557 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 557 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 557, and, on that basis, denies them. To the extent allegations contained in Paragraph 557 pertain to Cortland, they are denied.

558. To the extent the allegations in Paragraph 558 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 558 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 558, and, on that basis, denies them. To the extent allegations contained in Paragraph 558 pertain to Cortland, they are denied.

559. To the extent the allegations in Paragraph 559 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 559 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 559, and, on that basis, denies them. To the extent allegations contained in Paragraph 559 pertain to Cortland, they are denied.

**xxv. San Diego, California**

560. To the extent the allegations in Paragraph 560 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 560 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 560 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 560, and, on that basis, denies them. To the extent allegations contained in Paragraph 560 pertain to Cortland, they are denied.



561. To the extent the allegations in Paragraph 561 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 561 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 561 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 561, and, on that basis, denies them. To the extent allegations contained in Paragraph 561 pertain to Cortland, they are denied.

562. To the extent the allegations in Paragraph 562 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 562 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 562, and, on that basis, denies them. To the extent allegations contained in Paragraph 562 pertain to Cortland, they are denied.

563. To the extent the allegations in Paragraph 563 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 563 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 563, and, on that basis, denies them. To the extent allegations contained in Paragraph 563 pertain to Cortland, they are denied.

564. To the extent the allegations in Paragraph 564 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 564 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 564, and, on that basis, denies them. To the extent allegations contained in Paragraph 564 pertain to Cortland, they are denied.

565. To the extent the allegations in Paragraph 565 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 565 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 565, and, on that basis, denies them. To the extent allegations contained in Paragraph 565 pertain to Cortland, they are denied.

566. To the extent the allegations in Paragraph 566 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 566 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 566, and, on that basis, denies them. To the extent allegations contained in Paragraph 566 pertain to Cortland, they are denied.

**xxvi. San Francisco, California**

567. To the extent the allegations in Paragraph 567 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 567 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 567 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 567, and, on that basis, denies them. To the extent allegations contained in Paragraph 567 pertain to Cortland, they are denied.

568. To the extent the allegations in Paragraph 568 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 568 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 568 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in

Paragraph 568, and, on that basis, denies them. To the extent allegations contained in Paragraph 568 pertain to Cortland, they are denied.

569. To the extent the allegations in Paragraph 569 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 569 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 569, and, on that basis, denies them. To the extent allegations contained in Paragraph 569 pertain to Cortland, they are denied.

570. To the extent the allegations in Paragraph 570 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 570 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 570, and, on that basis, denies them. To the extent allegations contained in Paragraph 570 pertain to Cortland, they are denied.

571. To the extent the allegations in Paragraph 571 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 571 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 571, and, on that basis, denies them. To the extent allegations contained in Paragraph 571 pertain to Cortland, they are denied.

572. To the extent the allegations in Paragraph 572 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 572 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 572, and, on that basis, denies them. To the extent allegations contained in Paragraph 572 pertain to Cortland, they are denied.

573. To the extent the allegations in Paragraph 573 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 573 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 573, and, on that basis, denies them. To the extent allegations contained in Paragraph 573 pertain to Cortland, they are denied.

**xxvii. San Jose, California**

574. To the extent the allegations in Paragraph 574 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 574 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 574 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 574, and, on that basis, denies them. To the extent allegations contained in Paragraph 574 pertain to Cortland, they are denied.

575. To the extent the allegations in Paragraph 575 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 575 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 575 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 575, and, on that basis, denies them. To the extent allegations contained in Paragraph 575 pertain to Cortland, they are denied.

576. To the extent the allegations in Paragraph 576 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 576 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient

to form a belief as to the truth of the allegations in Paragraph 576, and, on that basis, denies them. To the extent allegations contained in Paragraph 576 pertain to Cortland, they are denied.

577. To the extent the allegations in Paragraph 577 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 577 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 577, and, on that basis, denies them. To the extent allegations contained in Paragraph 577 pertain to Cortland, they are denied.

578. To the extent the allegations in Paragraph 578 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 578 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 578, and, on that basis, denies them. To the extent allegations contained in Paragraph 578 pertain to Cortland, they are denied.

579. To the extent the allegations in Paragraph 579 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 579 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 579, and, on that basis, denies them. To the extent allegations contained in Paragraph 579 pertain to Cortland, they are denied.

580. To the extent the allegations in Paragraph 580 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 580 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 580, and, on that basis, denies them. To the extent allegations contained in Paragraph 580 pertain to Cortland, they are denied.

**xxviii. Seattle, Washington**

581. To the extent the allegations in Paragraph 581 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 581 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 581 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 581, and, on that basis, denies them. To the extent allegations contained in Paragraph 581 pertain to Cortland, they are denied.

582. To the extent the allegations in Paragraph 582 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 582 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 582 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 582, and, on that basis, denies them. To the extent allegations contained in Paragraph 582 pertain to Cortland, they are denied.

583. To the extent the allegations in Paragraph 583 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 583 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 583, and, on that basis, denies them. To the extent allegations contained in Paragraph 583 pertain to Cortland, they are denied.

584. To the extent the allegations in Paragraph 584 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 584 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient

to form a belief as to the truth of the allegations in Paragraph 584, and, on that basis, denies them. To the extent allegations contained in Paragraph 584 pertain to Cortland, they are denied.

585. To the extent the allegations in Paragraph 585 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 585 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 585, and, on that basis, denies them. To the extent allegations contained in Paragraph 585 pertain to Cortland, they are denied.

586. To the extent the allegations in Paragraph 586 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 586 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 586, and, on that basis, denies them. To the extent allegations contained in Paragraph 586 pertain to Cortland, they are denied.

587. To the extent the allegations in Paragraph 587 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 587 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 587, and, on that basis, denies them. To the extent allegations contained in Paragraph 587 pertain to Cortland, they are denied.

**xxix. St. Louis, Missouri**

588. To the extent the allegations in Paragraph 588 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 588 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 588 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in

Paragraph 588, and, on that basis, denies them. To the extent allegations contained in Paragraph 588 pertain to Cortland, they are denied.

589. To the extent the allegations in Paragraph 589 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 589 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 589 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 589, and, on that basis, denies them. To the extent allegations contained in Paragraph 589 pertain to Cortland, they are denied.

590. To the extent the allegations in Paragraph 590 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 590 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 590, and, on that basis, denies them. To the extent allegations contained in Paragraph 590 pertain to Cortland, they are denied.

591. To the extent the allegations in Paragraph 591 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 591 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 591, and, on that basis, denies them. To the extent allegations contained in Paragraph 591 pertain to Cortland, they are denied.

592. To the extent the allegations in Paragraph 592 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 592 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient



to form a belief as to the truth of the allegations in Paragraph 592, and, on that basis, denies them. To the extent allegations contained in Paragraph 592 pertain to Cortland, they are denied.

593. To the extent the allegations in Paragraph 593 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 593 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 593, and, on that basis, denies them. To the extent allegations contained in Paragraph 593 pertain to Cortland, they are denied.

**xxx. Tampa, Florida**

594. To the extent the allegations in Paragraph 594 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 594 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 594 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 594, and, on that basis, denies them. To the extent allegations contained in Paragraph 594 pertain to Cortland, they are denied.

595. To the extent the allegations in Paragraph 595 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 595 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 595 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 595, and, on that basis, denies them. To the extent allegations contained in Paragraph 595 pertain to Cortland, they are denied.

596. To the extent the allegations in Paragraph 596 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 596 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 596, and, on that basis, denies them. To the extent allegations contained in Paragraph 596 pertain to Cortland, they are denied.

597. To the extent the allegations in Paragraph 597 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 597 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 597, and, on that basis, denies them. To the extent allegations contained in Paragraph 597 pertain to Cortland, they are denied.

598. To the extent the allegations in Paragraph 598 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 598 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 598, and, on that basis, denies them. To the extent allegations contained in Paragraph 598 pertain to Cortland, they are denied.

599. To the extent the allegations in Paragraph 599 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 599 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 599, and, on that basis, denies them. To the extent allegations contained in Paragraph 599 pertain to Cortland, they are denied.

**xxxi. Tucson, Arizona**

600. To the extent the allegations in Paragraph 600 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph

600 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 600 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 600, and, on that basis, denies them. To the extent allegations contained in Paragraph 600 pertain to Cortland, they are denied.

601. To the extent the allegations in Paragraph 601 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 601 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 601 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 601, and, on that basis, denies them. To the extent allegations contained in Paragraph 601 pertain to Cortland, they are denied.

602. To the extent the allegations in Paragraph 602 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 602 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 602, and, on that basis, denies them. To the extent allegations contained in Paragraph 602 pertain to Cortland, they are denied.

603. To the extent the allegations in Paragraph 603 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 603 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 603, and, on that basis, denies them. To the extent allegations contained in Paragraph 603 pertain to Cortland, they are denied.

604. To the extent the allegations in Paragraph 604 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 604 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 604, and, on that basis, denies them. To the extent allegations contained in Paragraph 604 pertain to Cortland, they are denied.

605. To the extent the allegations in Paragraph 605 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 605 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 605, and, on that basis, denies them. To the extent allegations contained in Paragraph 605 pertain to Cortland, they are denied.

**xxxii. Washington, District of Columbia**

606. To the extent the allegations in Paragraph 606 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 606 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 606 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 606, and, on that basis, denies them. To the extent allegations contained in Paragraph 606 pertain to Cortland, they are denied.

607. To the extent the allegations in Paragraph 607 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 607 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 607 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in

Paragraph 607, and, on that basis, denies them. To the extent allegations contained in Paragraph 607 pertain to Cortland, they are denied.

608. To the extent the allegations in Paragraph 608 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 608 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 608, and, on that basis, denies them. To the extent allegations contained in Paragraph 608 pertain to Cortland, they are denied.

609. To the extent the allegations in Paragraph 609 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 609 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 609, and, on that basis, denies them. To the extent allegations contained in Paragraph 609 pertain to Cortland, they are denied.

610. To the extent the allegations in Paragraph 610 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 610 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 610, and, on that basis, denies them. To the extent allegations contained in Paragraph 610 pertain to Cortland, they are denied.

611. To the extent the allegations in Paragraph 611 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 611 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 611, and, on that basis, denies them. To the extent allegations contained in Paragraph 611 pertain to Cortland, they are denied.

612. To the extent the allegations in Paragraph 612 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 612 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 612, and, on that basis, denies them. To the extent allegations contained in Paragraph 612 pertain to Cortland, they are denied.

**xxxiii. Wilmington, North Carolina**

613. To the extent the allegations in Paragraph 613 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 613 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 613 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 613, and, on that basis, denies them. To the extent allegations contained in Paragraph 613 pertain to Cortland, they are denied.

614. To the extent the allegations in Paragraph 614 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 614 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 614 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 614, and, on that basis, denies them. To the extent allegations contained in Paragraph 614 pertain to Cortland, they are denied.

615. To the extent the allegations in Paragraph 615 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 615 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient

to form a belief as to the truth of the allegations in Paragraph 615, and, on that basis, denies them. To the extent allegations contained in Paragraph 615 pertain to Cortland, they are denied.

616. To the extent the allegations in Paragraph 616 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 616 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 616, and, on that basis, denies them. To the extent allegations contained in Paragraph 616 pertain to Cortland, they are denied.

617. To the extent the allegations in Paragraph 617 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 617 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 617, and, on that basis, denies them. To the extent allegations contained in Paragraph 617 pertain to Cortland, they are denied.

618. To the extent the allegations in Paragraph 618 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 618 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 618, and, on that basis, denies them. To the extent allegations contained in Paragraph 618 pertain to Cortland, they are denied.

619. To the extent the allegations in Paragraph 619 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 619 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 619, and, on that basis, denies them. To the extent allegations contained in Paragraph 619 pertain to Cortland, they are denied.

#### **xxxiv. Birmingham-Hoover, AL MSA**

620. To the extent the allegations in Paragraph 620 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 620 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 620 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 620, and, on that basis, denies them. To the extent allegations contained in Paragraph 620 pertain to Cortland, they are denied.

621. To the extent the allegations in Paragraph 621 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 621 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 621, and, on that basis, denies them. To the extent allegations contained in Paragraph 621 pertain to Cortland, they are denied.

622. To the extent the allegations in Paragraph 622 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 622 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 622, and, on that basis, denies them. To the extent allegations contained in Paragraph 622 pertain to Cortland, they are denied.

623. To the extent the allegations in Paragraph 623 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 623 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 623, and, on that basis, denies them. To the extent allegations contained in Paragraph 623 pertain to Cortland, they are denied.



624. To the extent the allegations in Paragraph 624 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 624 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 624, and, on that basis, denies them. To the extent allegations contained in Paragraph 624 pertain to Cortland, they are denied.

**xxxv. Buffalo, New York**

625. To the extent the allegations in Paragraph 625 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 625 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 625 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 625, and, on that basis, denies them. To the extent allegations contained in Paragraph 625 pertain to Cortland, they are denied.

626. To the extent the allegations in Paragraph 626 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 626 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 626, and, on that basis, denies them. To the extent allegations contained in Paragraph 626 pertain to Cortland, they are denied.

627. To the extent the allegations in Paragraph 627 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 627 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 627, and, on that basis, denies them. To the extent allegations contained in Paragraph 627 pertain to Cortland, they are denied.

628. To the extent the allegations in Paragraph 628 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 628 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 628, and, on that basis, denies them. To the extent allegations contained in Paragraph 628 pertain to Cortland, they are denied.

629. To the extent the allegations in Paragraph 629 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 629 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 629, and, on that basis, denies them. To the extent allegations contained in Paragraph 629 pertain to Cortland, they are denied.

**xxxvi. Cincinnati, Ohio**

630. To the extent the allegations in Paragraph 630 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 630 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 630 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 630, and, on that basis, denies them. To the extent allegations contained in Paragraph 630 pertain to Cortland, they are denied.

631. To the extent the allegations in Paragraph 631 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 631 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 631, and, on that basis, denies them. To the extent allegations contained in Paragraph 631 pertain to Cortland, they are denied.

632. To the extent the allegations in Paragraph 632 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 632 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 632, and, on that basis, denies them. To the extent allegations contained in Paragraph 632 pertain to Cortland, they are denied.

633. To the extent the allegations in Paragraph 633 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 633 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 633, and, on that basis, denies them. To the extent allegations contained in Paragraph 633 pertain to Cortland, they are denied.

634. To the extent the allegations in Paragraph 634 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 634 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 634, and, on that basis, denies them. To the extent allegations contained in Paragraph 634 pertain to Cortland, they are denied.

**xxxvii. Cleveland, Ohio**

635. To the extent the allegations in Paragraph 635 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 635 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 635 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 635, and, on that basis, denies them. To the extent allegations contained in Paragraph 635 pertain to Cortland, they are denied.

636. To the extent the allegations in Paragraph 636 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 636 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 636, and, on that basis, denies them. To the extent allegations contained in Paragraph 636 pertain to Cortland, they are denied.

637. To the extent the allegations in Paragraph 637 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 637 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 637, and, on that basis, denies them. To the extent allegations contained in Paragraph 637 pertain to Cortland, they are denied.

638. To the extent the allegations in Paragraph 638 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 638 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 638, and, on that basis, denies them. To the extent allegations contained in Paragraph 638 pertain to Cortland, they are denied. .

639. To the extent the allegations in Paragraph 639 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 639 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 639, and, on that basis, denies them. To the extent allegations contained in Paragraph 639 pertain to Cortland, they are denied.

**xxxviii. Columbus, Ohio**

640. To the extent the allegations in Paragraph 640 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph

640 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 640 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 640, and, on that basis, denies them. To the extent allegations contained in Paragraph 640 pertain to Cortland, they are denied.

641. To the extent the allegations in Paragraph 641 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 641 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 641, and, on that basis, denies them. To the extent allegations contained in Paragraph 641 pertain to Cortland, they are denied.

642. To the extent the allegations in Paragraph 642 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 642 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 642, and, on that basis, denies them. To the extent allegations contained in Paragraph 642 pertain to Cortland, they are denied.

643. To the extent the allegations in Paragraph 643 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 643 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 643, and, on that basis, denies them. To the extent allegations contained in Paragraph 643 pertain to Cortland, they are denied.

644. To the extent the allegations in Paragraph 644 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 644 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient

to form a belief as to the truth of the allegations in Paragraph 644, and, on that basis, denies them. To the extent allegations contained in Paragraph 644 pertain to Cortland, they are denied.

**xxxix. Hartford, Connecticut**

645. To the extent the allegations in Paragraph 645 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 645 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 645 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 645, and, on that basis, denies them. To the extent allegations contained in Paragraph 645 pertain to Cortland, they are denied.

646. To the extent the allegations in Paragraph 646 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 646 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 646, and, on that basis, denies them. To the extent allegations contained in Paragraph 646 pertain to Cortland, they are denied.

647. To the extent the allegations in Paragraph 647 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 647 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 647, and, on that basis, denies them. To the extent allegations contained in Paragraph 647 pertain to Cortland, they are denied.

648. To the extent the allegations in Paragraph 648 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 648 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient

to form a belief as to the truth of the allegations in Paragraph 648, and, on that basis, denies them. To the extent allegations contained in Paragraph 648 pertain to Cortland, they are denied.

649. To the extent the allegations in Paragraph 649 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 649 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 649, and, on that basis, denies them. To the extent allegations contained in Paragraph 649 pertain to Cortland, they are denied.

**xl. Riverside, California**

650. To the extent the allegations in Paragraph 650 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 650 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 650 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 650, and, on that basis, denies them. To the extent allegations contained in Paragraph 650 pertain to Cortland, they are denied.

651. To the extent the allegations in Paragraph 651 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 651 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 651, and, on that basis, denies them. To the extent allegations contained in Paragraph 651 pertain to Cortland, they are denied.

652. To the extent the allegations in Paragraph 652 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 652 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient

to form a belief as to the truth of the allegations in Paragraph 652, and, on that basis, denies them. To the extent allegations contained in Paragraph 652 pertain to Cortland, they are denied.

653. To the extent the allegations in Paragraph 653 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 653 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 653, and, on that basis, denies them. To the extent allegations contained in Paragraph 653 pertain to Cortland, they are denied.

654. To the extent the allegations in Paragraph 654 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 654 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 654, and, on that basis, denies them. To the extent allegations contained in Paragraph 654 pertain to Cortland, they are denied.

**xli. Sacramento, California**

655. To the extent the allegations in Paragraph 655 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 655 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 655 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 655, and, on that basis, denies them. To the extent allegations contained in Paragraph 655 pertain to Cortland, they are denied.

656. To the extent the allegations in Paragraph 656 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 656 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient



to form a belief as to the truth of the allegations in Paragraph 656, and, on that basis, denies them. To the extent allegations contained in Paragraph 656 pertain to Cortland, they are denied.

657. To the extent the allegations in Paragraph 657 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 657 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 657, and, on that basis, denies them. To the extent allegations contained in Paragraph 657 pertain to Cortland, they are denied.

658. To the extent the allegations in Paragraph 658 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 658 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 658, and, on that basis, denies them. To the extent allegations contained in Paragraph 658 pertain to Cortland, they are denied.

659. To the extent the allegations in Paragraph 659 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 659 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 659, and, on that basis, denies them. To the extent allegations contained in Paragraph 659 pertain to Cortland, they are denied.

**xlii. Salt Lake City, Utah**

660. To the extent the allegations in Paragraph 660 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 660 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 660 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in

Paragraph 660, and, on that basis, denies them. To the extent allegations contained in Paragraph 660 pertain to Cortland, they are denied.

661. To the extent the allegations in Paragraph 661 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 661 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 661, and, on that basis, denies them. To the extent allegations contained in Paragraph 661 pertain to Cortland, they are denied.

662. To the extent the allegations in Paragraph 662 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 662 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 662, and, on that basis, denies them. To the extent allegations contained in Paragraph 662 pertain to Cortland, they are denied.

663. To the extent the allegations in Paragraph 663 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 663 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 663, and, on that basis, denies them. To the extent allegations contained in Paragraph 663 pertain to Cortland, they are denied.

664. To the extent the allegations in Paragraph 664 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 664 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 664, and, on that basis, denies them. To the extent allegations contained in Paragraph 664 pertain to Cortland, they are denied.

**xliii. San Antonio, Texas**

665. To the extent the allegations in Paragraph 665 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 665 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 665 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 665, and, on that basis, denies them. To the extent allegations contained in Paragraph 665 pertain to Cortland, they are denied.

666. To the extent the allegations in Paragraph 666 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 666 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 666, and, on that basis, denies them. To the extent allegations contained in Paragraph 666 pertain to Cortland, they are denied.

667. To the extent the allegations in Paragraph 667 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 667 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 667, and, on that basis, denies them. To the extent allegations contained in Paragraph 667 pertain to Cortland, they are denied.

668. To the extent the allegations in Paragraph 668 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 668 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 668, and, on that basis, denies them. To the extent allegations contained in Paragraph 668 pertain to Cortland, they are denied.

669. To the extent the allegations in Paragraph 669 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 669 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 669, and, on that basis, denies them. To the extent allegations contained in Paragraph 669 pertain to Cortland, they are denied.

**xliv. San Juan, Puerto Rico**

670. To the extent the allegations in Paragraph 670 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 670 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 670 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 670, and, on that basis, denies them. To the extent allegations contained in Paragraph 670 pertain to Cortland, they are denied.

671. To the extent the allegations in Paragraph 671 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 671 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 671, and, on that basis, denies them. To the extent allegations contained in Paragraph 671 pertain to Cortland, they are denied.

672. To the extent the allegations in Paragraph 672 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 672 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 672, and, on that basis, denies them. To the extent allegations contained in Paragraph 672 pertain to Cortland, they are denied.

**xlv. Virginia Beach, Virginia**

673. To the extent the allegations in Paragraph 673 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 673 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 673 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 673, and, on that basis, denies them. To the extent allegations contained in Paragraph 673 pertain to Cortland, they are denied.

674. To the extent the allegations in Paragraph 674 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 674 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 674, and, on that basis, denies them. To the extent allegations contained in Paragraph 674 pertain to Cortland, they are denied.

675. To the extent the allegations in Paragraph 675 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 675 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 675, and, on that basis, denies them. To the extent allegations contained in Paragraph 675 pertain to Cortland, they are denied.

676. To the extent the allegations in Paragraph 676 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 676 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 676, and, on that basis, denies them. To the extent allegations contained in Paragraph 676 pertain to Cortland, they are denied.

677. To the extent the allegations in Paragraph 677 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 677 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 677, and, on that basis, denies them. To the extent allegations contained in Paragraph 677 pertain to Cortland, they are denied.

678. To the extent the allegations in Paragraph 678 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 678 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 678, and, on that basis, denies them. To the extent allegations contained in Paragraph 678 pertain to Cortland, they are denied.

679. To the extent the allegations in Paragraph 679 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 679 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 679, and, on that basis, denies them. To the extent allegations contained in Paragraph 679 pertain to Cortland, they are denied.

680. To the extent the allegations in Paragraph 680 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 680 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 680, and, on that basis, denies them. To the extent allegations contained in Paragraph 680 pertain to Cortland, they are denied.

## **VII. CLASS ACTION ALLEGATIONS**

681. To the extent the allegations in Paragraph 681 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 681

that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 681, and, on that basis, denies them. To the extent allegations contained in Paragraph 681 pertain to Cortland, they are denied.

682. To the extent the allegations in Paragraph 682 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 682 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 682, and, on that basis, denies them. To the extent allegations contained in Paragraph 682 pertain to Cortland, they are denied.

683. To the extent the allegations in Paragraph 683 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 683 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 683, and, on that basis, denies them. To the extent allegations contained in Paragraph 683 pertain to Cortland, they are denied.

684. To the extent the allegations in Paragraph 684 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 684 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 684, and, on that basis, denies them. To the extent allegations contained in Paragraph 684 pertain to Cortland, they are denied.

685. To the extent the allegations in Paragraph 685 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 685 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 685, and, on that basis, denies them. To the extent allegations contained in Paragraph 685 pertain to Cortland, they are denied.

686. To the extent the allegations in Paragraph 686 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 686 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 686, and, on that basis, denies them. To the extent allegations contained in Paragraph 686 pertain to Cortland, they are denied.

687. To the extent the allegations in Paragraph 687 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 687 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 687, and, on that basis, denies them. To the extent allegations contained in Paragraph 687 pertain to Cortland, they are denied.

688. To the extent the allegations in Paragraph 688 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 688 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 688, and, on that basis, denies them. To the extent allegations contained in Paragraph 688 pertain to Cortland, they are denied.

689. To the extent the allegations in Paragraph 689 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 689 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 689, and, on that basis, denies them. To the extent allegations contained in Paragraph 689 pertain to Cortland, they are denied.

690. To the extent the allegations in Paragraph 690 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 690 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient



to form a belief as to the truth of the allegations in Paragraph 690, and, on that basis, denies them. To the extent allegations contained in Paragraph 690 pertain to Cortland, they are denied.

### **VIII. ANTITRUST INJURY**

691. To the extent the allegations in Paragraph 691 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 691 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 691, and, on that basis, denies them. To the extent allegations contained in Paragraph 691 pertain to Cortland, they are denied.

692. To the extent the allegations in Paragraph 692 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 692 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 692, and, on that basis, denies them. To the extent allegations contained in Paragraph 692 pertain to Cortland, they are denied.

693. To the extent the allegations in Paragraph 693 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 693 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 693, and, on that basis, denies them. To the extent allegations contained in Paragraph 693 pertain to Cortland, they are denied.

### **IX. CONTINUING VIOLATION**

694. To the extent the allegations in Paragraph 694 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 694 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient

to form a belief as to the truth of the allegations in Paragraph 694, and, on that basis, denies them. To the extent allegations contained in Paragraph 694 pertain to Cortland, they are denied.

695. To the extent the allegations in Paragraph 695 are legal conclusions and characterizations, no responsive pleading is required. To the extent that the allegations in Paragraph 695 purport to quote from or interpret portions of a document, that document speaks for itself. As to allegations contained in Paragraph 695 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 695, and, on that basis, denies them. To the extent allegations contained in Paragraph 695 pertain to Cortland, they are denied.

696. To the extent the allegations in Paragraph 696 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 696 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 696, and, on that basis, denies them. To the extent allegations contained in Paragraph 696 pertain to Cortland, they are denied.

697. To the extent the allegations in Paragraph 697 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 697 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 697, and, on that basis, denies them. To the extent allegations contained in Paragraph 697 pertain to Cortland, they are denied.

698. To the extent the allegations in Paragraph 698 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 698 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient

to form a belief as to the truth of the allegations in Paragraph 698, and, on that basis, denies them. To the extent allegations contained in Paragraph 698 pertain to Cortland, they are denied.

699. To the extent the allegations in Paragraph 699 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 699 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 699, and, on that basis, denies them. To the extent allegations contained in Paragraph 699 pertain to Cortland, they are denied.

700. To the extent the allegations in Paragraph 700 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 700 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 700, and, on that basis, denies them. To the extent allegations contained in Paragraph 700 pertain to Cortland, they are denied.

## **X. CLAIMS FOR RELIEF**

### **COUNT I**

#### **Price Fixing in Violation of Section 1 of the Sherman Act (15 U.S.C. § 1)**

701. Cortland reasserts and hereby incorporates by reference its responses to each Paragraph of Plaintiffs' Complaint, as though fully set forth herein.

702. To the extent the allegations in Paragraph 702 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 702 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 702, and, on that basis, denies them. To the extent allegations contained in Paragraph 702 pertain to Cortland, they are denied. .

703. To the extent the allegations in Paragraph 703 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 703 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 703, and, on that basis, denies them. To the extent allegations contained in Paragraph 703 pertain to Cortland, they are denied.

704. To the extent the allegations in Paragraph 704 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 704 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 704, and, on that basis, denies them. To the extent allegations contained in Paragraph 704 pertain to Cortland, they are denied.

705. To the extent the allegations in Paragraph 705 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 705 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 705, and, on that basis, denies them. To the extent allegations contained in Paragraph 705 pertain to Cortland, they are denied.

706. To the extent the allegations in Paragraph 706 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 706 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 706, and, on that basis, denies them. To the extent allegations contained in Paragraph 706 pertain to Cortland, they are denied.

707. To the extent the allegations in Paragraph 707 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 707 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient

to form a belief as to the truth of the allegations in Paragraph 707, and, on that basis, denies them. To the extent allegations contained in Paragraph 707 pertain to Cortland, they are denied.

**COUNT II**  
**Violation of State Antitrust Statutes**  
**(On behalf of Plaintiffs and the Class)**

708. Cortland reasserts and hereby incorporates by reference its responses to each Paragraph of Plaintiffs' Complaint, as though fully set forth herein.

709. To the extent the allegations in Paragraph 709 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 709 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 709, and, on that basis, denies them. To the extent allegations contained in Paragraph 709 pertain to Cortland, they are denied.

710. To the extent the allegations in Paragraph 710 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 710 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 710, and, on that basis, denies them. To the extent allegations contained in Paragraph 710 pertain to Cortland, they are denied.

711. To the extent the allegations in Paragraph 711 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 711 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 711, and, on that basis, denies them. To the extent allegations contained in Paragraph 711 pertain to Cortland, they are denied.

712. To the extent the allegations in Paragraph 712 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 712

that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 712, and, on that basis, denies them. To the extent allegations contained in Paragraph 712 pertain to Cortland, they are denied.

713. To the extent the allegations in Paragraph 713 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 713 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 713, and, on that basis, denies them. To the extent allegations contained in Paragraph 713 pertain to Cortland, they are denied.

714. To the extent the allegations in Paragraph 714 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 714 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 714, and, on that basis, denies them. To the extent allegations contained in Paragraph 714 pertain to Cortland, they are denied.

715. Cortland reasserts and hereby incorporates by reference its responses to each Paragraph of Plaintiffs' Complaint, as though fully set forth herein. To the extent the allegations in Paragraph 715 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 715 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 715, and, on that basis, denies them. To the extent allegations contained in Paragraph 715 pertain to Cortland, they are denied.

716. Cortland reasserts and hereby incorporates by reference its responses to each Paragraph of Plaintiffs' Complaint, as though fully set forth herein. To the extent the allegations in Paragraph 716 are legal conclusions and characterizations, no responsive pleading is required. As

to allegations contained in Paragraph 716 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 716, and, on that basis, denies them. To the extent allegations contained in Paragraph 716 pertain to Cortland, they are denied.

717. Cortland reasserts and hereby incorporates by reference its responses to each Paragraph of Plaintiffs' Complaint, as though fully set forth herein. To the extent the allegations in Paragraph 717 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 717 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 717, and, on that basis, denies them. To the extent allegations contained in Paragraph 717 pertain to Cortland, they are denied.

718. Cortland reasserts and hereby incorporates by reference its responses to each Paragraph of Plaintiffs' Complaint, as though fully set forth herein. To the extent the allegations in Paragraph 718 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 718 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 718, and, on that basis, denies them. To the extent allegations contained in Paragraph 718 pertain to Cortland, they are denied.

719. Cortland reasserts and hereby incorporates by reference its responses to each Paragraph of Plaintiffs' Complaint, as though fully set forth herein. To the extent the allegations in Paragraph 719 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 719 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in

Paragraph 719, and, on that basis, denies them. To the extent allegations contained in Paragraph 719 pertain to Cortland, they are denied.

720. Cortland reasserts and hereby incorporates by reference its responses to each Paragraph of Plaintiffs' Complaint, as though fully set forth herein. To the extent the allegations in Paragraph 720 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 720 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 720, and, on that basis, denies them. To the extent allegations contained in Paragraph 720 pertain to Cortland, they are denied.

721. Cortland reasserts and hereby incorporates by reference its responses to each Paragraph of Plaintiffs' Complaint, as though fully set forth herein. To the extent the allegations in Paragraph 721 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 721 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 721, and, on that basis, denies them. To the extent allegations contained in Paragraph 721 pertain to Cortland, they are denied.

722. Cortland reasserts and hereby incorporates by reference its responses to each Paragraph of Plaintiffs' Complaint, as though fully set forth herein. To the extent the allegations in Paragraph 722 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 722 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 722, and, on that basis, denies them. To the extent allegations contained in Paragraph 722 pertain to Cortland, they are denied.



723. Cortland reasserts and hereby incorporates by reference its responses to each Paragraph of Plaintiffs' Complaint, as though fully set forth herein. To the extent the allegations in Paragraph 723 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 723 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 723, and, on that basis, denies them. To the extent allegations contained in Paragraph 723 pertain to Cortland, they are denied.

724. Cortland reasserts and hereby incorporates by reference its responses to each Paragraph of Plaintiffs' Complaint, as though fully set forth herein. To the extent the allegations in Paragraph 724 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 724 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 724, and, on that basis, denies them. To the extent allegations contained in Paragraph 724 pertain to Cortland, they are denied.

725. Cortland reasserts and hereby incorporates by reference its responses to each Paragraph of Plaintiffs' Complaint, as though fully set forth herein. To the extent the allegations in Paragraph 725 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 725 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 725, and, on that basis, denies them. To the extent allegations contained in Paragraph 725 pertain to Cortland, they are denied.

726. Cortland reasserts and hereby incorporates by reference its responses to each Paragraph of Plaintiffs' Complaint, as though fully set forth herein. To the extent the allegations in

Paragraph 726 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 726 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 726, and, on that basis, denies them. To the extent allegations contained in Paragraph 726 pertain to Cortland, they are denied.

727. Cortland reasserts and hereby incorporates by reference its responses to each Paragraph of Plaintiffs' Complaint, as though fully set forth herein. To the extent the allegations in Paragraph 727 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 727 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 727, and, on that basis, denies them. To the extent allegations contained in Paragraph 727 pertain to Cortland, they are denied.

728. Cortland reasserts and hereby incorporates by reference its responses to each Paragraph of Plaintiffs' Complaint, as though fully set forth herein. To the extent the allegations in Paragraph 728 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 728 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 728, and, on that basis, denies them. To the extent allegations contained in Paragraph 728 pertain to Cortland, they are denied.

729. Cortland reasserts and hereby incorporates by reference its responses to each Paragraph of Plaintiffs' Complaint, as though fully set forth herein. To the extent the allegations in Paragraph 729 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 729 that pertain to other Defendants or third parties, Cortland

lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 729, and, on that basis, denies them. To the extent allegations contained in Paragraph 729 pertain to Cortland, they are denied.

730. Cortland reasserts and hereby incorporates by reference its responses to each Paragraph of Plaintiffs' Complaint, as though fully set forth herein. To the extent the allegations in Paragraph 730 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 730 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 730, and, on that basis, denies them. To the extent allegations contained in Paragraph 730 pertain to Cortland, they are denied.

731. Cortland reasserts and hereby incorporates by reference its responses to each Paragraph of Plaintiffs' Complaint, as though fully set forth herein. To the extent the allegations in Paragraph 731 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 731 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 731, and, on that basis, denies them. To the extent allegations contained in Paragraph 731 pertain to Cortland, they are denied.

732. Cortland reasserts and hereby incorporates by reference its responses to each Paragraph of Plaintiffs' Complaint, as though fully set forth herein. To the extent the allegations in Paragraph 732 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 732 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in

Paragraph 732, and, on that basis, denies them. To the extent allegations contained in Paragraph 732 pertain to Cortland, they are denied.

733. Cortland reasserts and hereby incorporates by reference its responses to each Paragraph of Plaintiffs' Complaint, as though fully set forth herein. To the extent the allegations in Paragraph 733 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 733 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 733, and, on that basis, denies them. To the extent allegations contained in Paragraph 733 pertain to Cortland, they are denied.

734. Cortland reasserts and hereby incorporates by reference its responses to each Paragraph of Plaintiffs' Complaint, as though fully set forth herein. To the extent the allegations in Paragraph 734 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 734 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 734, and, on that basis, denies them. To the extent allegations contained in Paragraph 734 pertain to Cortland, they are denied.

735. Cortland reasserts and hereby incorporates by reference its responses to each Paragraph of Plaintiffs' Complaint, as though fully set forth herein. To the extent the allegations in Paragraph 735 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 735 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 735, and, on that basis, denies them. To the extent allegations contained in Paragraph 735 pertain to Cortland, they are denied.

736. Cortland reasserts and hereby incorporates by reference its responses to each Paragraph of Plaintiffs' Complaint, as though fully set forth herein. To the extent the allegations in Paragraph 736 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 736 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 736, and, on that basis, denies them. To the extent allegations contained in Paragraph 736 pertain to Cortland, they are denied.

737. Cortland reasserts and hereby incorporates by reference its responses to each Paragraph of Plaintiffs' Complaint, as though fully set forth herein. To the extent the allegations in Paragraph 737 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 737 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 737, and, on that basis, denies them. To the extent allegations contained in Paragraph 737 pertain to Cortland, they are denied.

738. Cortland reasserts and hereby incorporates by reference its responses to each Paragraph of Plaintiffs' Complaint, as though fully set forth herein. To the extent the allegations in Paragraph 738 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 738 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 738, and, on that basis, denies them. To the extent allegations contained in Paragraph 738 pertain to Cortland, they are denied.

739. Cortland reasserts and hereby incorporates by reference its responses to each Paragraph of Plaintiffs' Complaint, as though fully set forth herein. To the extent the allegations in

Paragraph 739 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 739 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 739, and, on that basis, denies them. To the extent allegations contained in Paragraph 739 pertain to Cortland, they are denied.

740. Cortland reasserts and hereby incorporates by reference its responses to each Paragraph of Plaintiffs' Complaint, as though fully set forth herein. To the extent the allegations in Paragraph 740 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 740 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 740, and, on that basis, denies them. To the extent allegations contained in Paragraph 740 pertain to Cortland, they are denied.

741. Cortland reasserts and hereby incorporates by reference its responses to each Paragraph of Plaintiffs' Complaint, as though fully set forth herein. To the extent the allegations in Paragraph 741 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 741 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 741, and, on that basis, denies them. To the extent allegations contained in Paragraph 741 pertain to Cortland, they are denied.

742. Cortland reasserts and hereby incorporates by reference its responses to each Paragraph of Plaintiffs' Complaint, as though fully set forth herein. To the extent the allegations in Paragraph 742 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 742 that pertain to other Defendants or third parties, Cortland

lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 742, and, on that basis, denies them. To the extent allegations contained in Paragraph 742 pertain to Cortland, they are denied.

743. Cortland reasserts and hereby incorporates by reference its responses to each Paragraph of Plaintiffs' Complaint, as though fully set forth herein. To the extent the allegations in Paragraph 743 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 743 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 743, and, on that basis, denies them. To the extent allegations contained in Paragraph 743 pertain to Cortland, they are denied.

744. Cortland reasserts and hereby incorporates by reference its responses to each Paragraph of Plaintiffs' Complaint, as though fully set forth herein. To the extent the allegations in Paragraph 744 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 744 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 744, and, on that basis, denies them. To the extent allegations contained in Paragraph 744 pertain to Cortland, they are denied.

745. Cortland reasserts and hereby incorporates by reference its responses to each Paragraph of Plaintiffs' Complaint, as though fully set forth herein. To the extent the allegations in Paragraph 745 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 745 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in

Paragraph 745, and, on that basis, denies them. To the extent allegations contained in Paragraph 745 pertain to Cortland, they are denied.

746. Cortland reasserts and hereby incorporates by reference its responses to each Paragraph of Plaintiffs' Complaint, as though fully set forth herein. To the extent the allegations in Paragraph 746 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 746 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 746, and, on that basis, denies them. To the extent allegations contained in Paragraph 746 pertain to Cortland, they are denied.

747. Cortland reasserts and hereby incorporates by reference its responses to each Paragraph of Plaintiffs' Complaint, as though fully set forth herein. To the extent the allegations in Paragraph 747 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 747 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 747, and, on that basis, denies them. To the extent allegations contained in Paragraph 747 pertain to Cortland, they are denied.

748. Cortland reasserts and hereby incorporates by reference its responses to each Paragraph of Plaintiffs' Complaint, as though fully set forth herein. To the extent the allegations in Paragraph 748 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 748 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 748, and, on that basis, denies them. To the extent allegations contained in Paragraph 748 pertain to Cortland, they are denied.



749. Cortland reasserts and hereby incorporates by reference its responses to each Paragraph of Plaintiffs' Complaint, as though fully set forth herein. To the extent the allegations in Paragraph 749 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 749 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 749, and, on that basis, denies them. To the extent allegations contained in Paragraph 749 pertain to Cortland, they are denied.

750. Cortland reasserts and hereby incorporates by reference its responses to each Paragraph of Plaintiffs' Complaint, as though fully set forth herein. To the extent the allegations in Paragraph 750 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 750 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 750, and, on that basis, denies them. To the extent allegations contained in Paragraph 750 pertain to Cortland, they are denied.

751. Cortland reasserts and hereby incorporates by reference its responses to each Paragraph of Plaintiffs' Complaint, as though fully set forth herein. To the extent the allegations in Paragraph 751 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 751 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 751, and, on that basis, denies them. To the extent allegations contained in Paragraph 751 pertain to Cortland, they are denied.

752. Cortland reasserts and hereby incorporates by reference its responses to each Paragraph of Plaintiffs' Complaint, as though fully set forth herein. To the extent the allegations in

Paragraph 752 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 752 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 752, and, on that basis, denies them. To the extent allegations contained in Paragraph 752 pertain to Cortland, they are denied.

753. Cortland reasserts and hereby incorporates by reference its responses to each Paragraph of Plaintiffs' Complaint, as though fully set forth herein. To the extent the allegations in Paragraph 753 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 753 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 753, and, on that basis, denies them. To the extent allegations contained in Paragraph 753 pertain to Cortland, they are denied.

754. Cortland reasserts and hereby incorporates by reference its responses to each Paragraph of Plaintiffs' Complaint, as though fully set forth herein. To the extent the allegations in Paragraph 754 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 754 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 754, and, on that basis, denies them. To the extent allegations contained in Paragraph 754 pertain to Cortland, they are denied.

755. Cortland reasserts and hereby incorporates by reference its responses to each Paragraph of Plaintiffs' Complaint, as though fully set forth herein. To the extent the allegations in Paragraph 755 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 755 that pertain to other Defendants or third parties, Cortland

lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 755, and, on that basis, denies them. To the extent allegations contained in Paragraph 755 pertain to Cortland, they are denied.

756. Cortland reasserts and hereby incorporates by reference its responses to each Paragraph of Plaintiffs' Complaint, as though fully set forth herein. To the extent the allegations in Paragraph 756 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 756 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 756, and, on that basis, denies them. To the extent allegations contained in Paragraph 756 pertain to Cortland, they are denied.

757. Cortland reasserts and hereby incorporates by reference its responses to each Paragraph of Plaintiffs' Complaint, as though fully set forth herein. To the extent the allegations in Paragraph 757 are legal conclusions and characterizations, no responsive pleading is required. As to allegations contained in Paragraph 757 that pertain to other Defendants or third parties, Cortland lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 757, and, on that basis, denies them. To the extent allegations contained in Paragraph 757 pertain to Cortland, they are denied.

## **XI. PRAYER FOR RELIEF**

The remainder of the Complaint consists of Plaintiffs' prayer for relief to which no response is required. To the extent a response is required, Cortland denies that Plaintiffs are entitled to the relief sought in the Complaint or to any relief whatsoever.

## **JURY TRIAL DEMANDED**

Cortland admits that Plaintiffs have sought a jury trial in this action. However, such a trial is unnecessary as Plaintiffs' claims should be rejected as a matter of law. In addition, Cortland denies that Plaintiffs are entitled to a trial by jury to the extent a contractual agreement to arbitrate, to waive a jury trial, or to waive a class action entered into by Plaintiffs or any purported class member precludes such trial by jury.

### **CORTLAND'S DEFENSES**

Pursuant to Federal Rule of Civil Procedure 8(c), Cortland, without waiver, limitation, or prejudice, and without conceding that it bears the burden of proof or production, hereby asserts the following defenses:

#### **FIRST DEFENSE**

##### **(Failure To State A Claim)**

1. Plaintiffs' claims are barred in whole or in part because Plaintiffs' Second Amended Consolidated Class Action Complaint fails to state facts upon which relief can be granted.

#### **SECOND DEFENSE**

##### **(Statute of Limitations)**

2. Plaintiffs' claims are barred, in whole or in part, by the applicable federal or state statute of limitations.

3. To the extent Plaintiffs seek to bring claims outside the applicable federal or state statute of limitations, Plaintiffs' Complaint is time-barred.

4. To the extent that Plaintiffs' Complaint relies on information made public longer than the applicable federal or state statute of limitations period, Plaintiff's Complaint is time-barred.

### **THIRD DEFENSE**

#### **(No injury)**

5. Plaintiffs' claims are barred, in whole or in part, because Plaintiffs have not suffered any injury in fact or any injury cognizable under the antitrust laws.

6. Plaintiffs' alleged harm lies in their speculation that many companies colluded seamlessly through a conspiracy, resulting in their harm. In essence, Plaintiffs complain about the impact of naturally unpredictable changes in the market conditions that exist in the global, national, and local economy.

7. To the extent that Plaintiffs maintain that they were injured by these events, such an injury is not cognizable under the antitrust laws.

### **FOURTH DEFENSE**

#### **(Failure To Mitigate)**

8. Plaintiffs' claims are barred, in whole or in part, because Plaintiffs failed to exercise reasonable care to mitigate any damages they may have suffered.

9. To the extent Plaintiffs believed that Cortland agreed to use RealPage Revenue Management software and that such agreement had the effect of raising rental prices above competitive levels, Plaintiffs had an obligation to mitigate their damages by seeking other sources of supply, including from other property managers or owners. Plaintiffs' failure to exercise reasonable care to mitigate damages was the complete or partial cause of any damages Plaintiffs may have suffered.

### **FIFTH DEFENSE**

#### **(Lack of Proximate Cause & Intervening/Superseding Conduct)**

10. Plaintiffs' claims are barred, in whole or in part, because any alleged injuries and damages either were not legally or proximately caused by any acts or omissions of Cortland or were caused, if at all, solely and proximately by Plaintiffs' conduct or by the conduct of third parties including, without limitation, the prior, intervening, or superseding conduct of Plaintiffs or such third parties.

### **SIXTH DEFENSE**

#### **(Waiver)**

11. Plaintiffs' claims are barred, in whole or in part, by the doctrine of waiver.

12. Plaintiffs' continued rental leases at what they now allege are prices above the competitive level manifest an intention to waive any right to bring this suit and are inconsistent with any other intention.

13. Plaintiffs, by their actions, accepted the benefits of an ongoing relationship with Defendants and relinquished their rights to bring suit.

### **SEVENTH DEFENSE**

#### **(Laches)**

14. Plaintiffs' claims are barred by the equitable doctrine of laches.

15. Plaintiffs demonstrated an unreasonable lack of diligence in bringing their claims.

16. Plaintiffs' unreasonable lack of diligence in bringing their claims now bars them.

## **EIGHTH DEFENSE**

### **(Consent)**

17. Plaintiffs' claims are barred, in whole or in part, due to their ratification of, and consent to, the conduct of Cortland.

18. Plaintiffs' Complaint demonstrates its long-standing ratification of and consent to the complained-of conduct.

19. Accordingly, because Plaintiffs have been aware for years of the very same conduct they now challenge—and because some of that conduct provided Plaintiffs a direct benefit—Plaintiffs' claims are barred by the doctrine of ratification.

## **NINTH DEFENSE**

### **(*Noerr-Pennington* & Free Speech)**

20. Plaintiffs' claims are barred, in whole or in part, to the extent Plaintiffs seeks to impose liability on Cortland based on the exercise of any person or entity's right to petition federal, state, and local governmental bodies, including through public statements, because such conduct was immune under the *Noerr-Pennington* doctrine and privileged under the First Amendment to the U.S. Constitution.

## **TENTH DEFENSE**

### **(Arbitration Agreements, Class Action Waivers, or Other Contractual Terms)**

21. Plaintiffs' claims are barred, in whole or in part, to the extent the rental lease agreements pursuant to which Plaintiffs rented their apartments or other agreements a Plaintiff entered into with a Defendant contain arbitration clauses, clauses providing a different forum for the resolution of their claims, or provisions waiving a Plaintiff's ability to bring a representative or class action claim.

### **ELEVENTH DEFENSE**

#### **(Right to Set Off Amounts Paid)**

22. Without admitting the existence of any contract, combination, or conspiracy in restraint of trade, and expressly denying same, Plaintiffs' claims are barred, in whole or in part, by non-settling Defendants' right to set off any amounts paid to Plaintiffs by any Defendants who have settled, or do settle, Plaintiffs' claims against them in this action.

### **TWELFTH DEFENSE**

#### **(Contracts Without Any Purported Overcharge)**

23. Without admitting the existence of any contract, combination, or conspiracy in restraint of trade, and expressly denying same, Plaintiffs' claims are barred, in whole or in part, to the extent that Plaintiffs entered into contracts that do not include any purported overcharge.

### **THIRTEENTH DEFENSE**

#### **(Improper Damages)**

24. Plaintiffs' claims are barred, in whole or in part, to the extent they seek improper multiple damage awards, and damage awards duplicative of those sought in other actions, in violation of the Due Process guarantees of the Fifth and Fourteenth Amendments of the United States Constitution and of the Eighth Amendment of the United States Constitution.

### **FOURTEENTH DEFENSE**

#### **(Acquiescence)**

25. Plaintiffs' claims are barred, in whole or in part, by the Plaintiffs' knowing acquiescence to the restraints of trade alleged in the Complaint.

### **FIFTEENTH DEFENSE**

#### **(Damages Reduced by Plaintiffs' Conduct)**



26. Upon information and belief, Plaintiffs' claims are barred, in whole or in part, by Defendants' right to set off any amount paid to Plaintiffs by damages attributable to Plaintiffs' conduct to the extent Plaintiffs unlawfully shared information found to be competitively sensitive regarding their rental lease agreements or potential alternative rental lease agreements.

### **SIXTEENTH DEFENSE**

#### **(Lack of Jurisdiction)**

27. Some or all of Plaintiffs' state-law claims cannot be brought against Cortland for a lack of jurisdiction. For instance, the laws of the states cited in Count II of the Complaint are not intended to, and do not, apply to conduct occurring outside of those states, and Plaintiffs' Complaint does not include any Plaintiff from the States of Alaska, Arizona, District of Columbia, Hawaii, Idaho, Indiana, Iowa, Kansas, Louisiana, Maine, Maryland, Michigan, Minnesota, Mississippi, Missouri, Montana, Nebraska, New Hampshire, New Jersey, New Mexico, New York, North Carolina, North Dakota, Ohio, Oklahoma, Oregon, Pennsylvania, South Carolina, South Dakota, Utah, Vermont, Virginia, West Virginia, Wisconsin, and Wyoming.

28. Many of the state laws allegedly giving rise to Plaintiffs' claims do not apply because the alleged conduct did not occur within or substantially affect the citizens or commerce of the respective states, or because Cortland had no specific intent to impact the commerce of those states. As a result, the application of those state laws to Cortland's conduct would violate the Due Process Clauses and Commerce Clause of the U.S. Constitution, the principle of federalism, and the constitutions and laws of the respective states at issue.

29. Additionally, during some portion of the relevant time period, Cortland was the manager of multifamily housing properties only in the states of Alabama, Arizona, Colorado,

Florida, Georgia, Idaho, Illinois, Minnesota, North Carolina, Ohio, Tennessee, Texas, and Virginia. Cortland was not the manager of multifamily housing properties located in any other state.

30. To the extent that the Complaint seeks to assert claims or obtain relief on behalf of multifamily renters located outside of the jurisdictions governed by those laws, those claims are barred as improper assertions of extraterritorial jurisdiction and any effort to enforce those laws as to residents of other states would violate the Due Process Clause and the Commerce Clause of the U.S. Constitution and various state laws and constitutions.

#### **SEVENTEENTH DEFENSE**

##### **(No Private Right of Action)**

31. Some of Plaintiffs' state-law claims are barred, in whole or in part, to the extent Plaintiffs seek damages under state laws that do not permit recovery of damages by private plaintiffs.

#### **EIGHTEENTH DEFENSE**

##### **(Failure to Comply with State Law Notice)**

32. Plaintiffs' claims are barred, in whole or in part, to the extent that Plaintiffs failed to comply with the notice requirements under various state laws.

#### **NINETEENTH DEFENSE**

##### **(Justified & Pro-Competitive Conduct)**

33. Some or all of Plaintiffs' claims are barred, in whole or in part, because all of Cortland's conduct challenged by Plaintiffs was lawful, fair, non-deceptive, expressly authorized by law, justified, and pro-competitive; it constituted a bona fide business practice consistent with industry practices and was carried out in furtherance of legitimate business interests; and it was an essential part of Cortland's lawful business operations.

**TWENTIETH DEFENSE**

**(State Law Class Action Limitations)**

34. Some or all of the respective state-law claims at issue cannot be, and were not intended to be, applied in the class-action context.

**TWENTY-FIRST DEFENSE**

**(Incorporating Other Defendants' Defenses)**

35. Cortland adopts and incorporates by reference any and all other defenses asserted by any other Defendant to the extent that the defense would apply to Cortland.

**TWENTY-SECOND DEFENSE**

**(Right to Assert Other Defenses)**

36. Cortland reserves the right to assert other defenses as this action proceeds up to and including the time of trial.

**ADDITIONAL DEFENSES AND RESERVATION OF RIGHTS**

Cortland presently has insufficient knowledge or information to determine whether it may have additional, as yet unstated defenses. Cortland has not knowingly and intentionally waived any applicable defenses and reserves the right to assert additional defenses as they become known to it through discovery in this matter. Cortland reserves the right to amend this Answer to add, delete, or modify defenses based upon legal theories that may be or will be divulged through clarification of Plaintiffs' Complaint, through discovery, or through further legal analysis of Plaintiffs' position in this litigation.

WHEREFORE, having fully answered Plaintiffs' Complaint, Cortland requests judgment in its favor and against Plaintiffs, and for any other relief the Court deems just and proper.

Dated: February 5, 2024

/s/ Todd R. Seelman

Todd R. Seelman, admitted *Pro Hac Vice*

Thomas L. Dyer, admitted *Pro Hac Vice*

**LEWIS BRISBOIS BISGAARD & SMITH LLP**

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720.292.2002 (Telephone)

Todd.Seelman@lewisbrisbois.com

Thomas.Dyer@lewisbrisbois.com

*Counsel for Defendant Cortland Management,  
LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing was filed electronically on February 5, 2024, with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all attorneys of record registered on the Court's electronic filing system.

/s/ Thomas L. Dyer

Thomas L. Dyer